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Judge William Claster  
 CX-101

7 Attorneys for Plaintiffs and the proposed Class

8

9

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10

**FOR THE COUNTY OF ORANGE**

11

12

MATTHEW BARBA AND RENZO CALVO-  
 SAEZ, individually and on behalf of all others  
 13 similarly situated,

Case No.: 30-2025-01539616-CU-FR-CXC

14

Plaintiffs,

**CLASS ACTION COMPLAINT FOR:**

15

v.

1. Violation of California Civil Code § 1750, *et seq.*;
2. Violation of Business & Professions Code § 17200, *et seq.*

16

GENERAL MOTORS, LLC, a Delaware  
 17 corporation,

**JURY TRIAL DEMANDED**

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Defendant.

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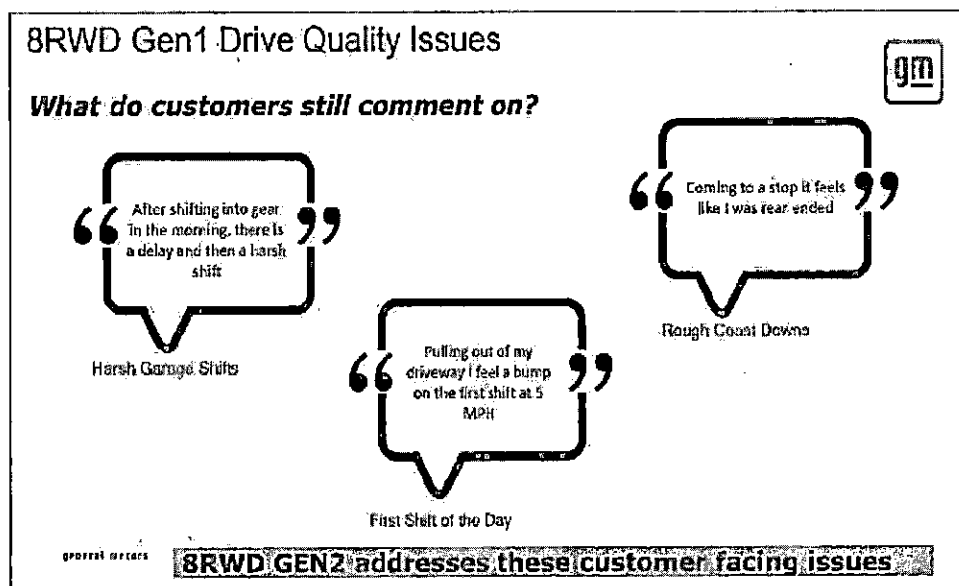
1 Plaintiffs Matthew Barba and Renzo Calvo-Saez, individually and on behalf of all others  
2 similarly situated, brings this action for damages and injunctive relief against Defendant General  
3 Motors, LLC (“GM” or “Defendant”), and alleges:

4 **INTRODUCTION**

5 1. Plaintiffs bring this action individually and on behalf of all other similarly situated  
6 California consumers (“Class Members”) who purchased in California 2019 model year Sierra,  
7 Silverado, Canyon, and Colorado vehicles designed, manufactured, marketed, distributed, sold,  
8 warranted and serviced by GM, equipped with GM’s eight-speed Hydra-Matic 8L90 transmission  
9 or Hydra-Matic 8L45 transmission manufactured after March 1, 2019 (“Class Vehicles”). Plaintiffs  
10 allege the Class Vehicles’ eight-speed transmission are defective, and that GM concealed and  
11 continues to deny any defect exists.

12 2. The first generation 8L90 and 8L45 transmissions built after March 1, 2019, have a  
13 design defect based on a common architecture which causes “harsh shifts” in lower gears, which can  
14 feel like jerking, lurching, and/or hesitations (“Shift Defect”).

15 3. According to GM, the Shift Defect has been described by customers as follows:<sup>1</sup>



28 <sup>1</sup> *Speerly et al. v. General Motors, LLC*, Case No. 19-cv-11044 (E.D. Mich.) (“*Speerly v. GM*”), ECF No. 209-7, PageID.12936.

1 4. The jerking, hesitation, surging, and lurching present a safety hazard because they  
2 affect the driver’s ability to control the vehicle’s speed, acceleration, and deceleration.

3 5. GM long knew internally of the defect. Despite stopgap attempts, it recognized only a  
4 major redesign in starting MY23 models (“Gen 2”) could address these issues. That redesign was  
5 approved back in early 2018.<sup>2</sup>  
6

7 **Essence of Learning:** Lessons learned were compiled, and incremental fixes both hardware and calibration were  
8 introduced between MY16-MY20 to improve warranty and customer satisfaction. Ultimately, some of the issues could not be  
9 resolved without a major redesign of the transmission, which was approved in early 2018 (3RWLD Gen 2).

10 6. GM is aware the Class Vehicles will experience the Shift Defect at levels well above  
11 GM’s warranty targets.<sup>3</sup>  
12

13 7. While the Shift Defect affects many GM vehicles, Plaintiffs seek to represent those  
14 California residents who purchased in California the 2019 Chevrolet Colorado and Silverado, and the  
15 2019 GMC Canyon and Sierra.  
16

17 8. When Class Members bring their vehicles to GM’s authorized dealers for repair, the  
18 dealers can only convey what is in GM’s technical service bulletins. They are told their vehicles are  
19 behaving normally or the that the shift quality issues are “characteristic.” They are given no repairs,  
20 or have their transmissions or components replaced with the same defective parts. GM knows those  
21 efforts won’t fix the Shift Defect—a December 2023<sup>4</sup> Technical Service Bulletin (“TSB”) designed  
22 to address harsh first shifts of the day notes “[r]eplacing transmission components or complete  
23 assemblies will not improve the condition.”  
24  
25  
26  
27

28 <sup>2</sup> *Speerly v. GM*, ECF No. 173-5, PageID.5934.

<sup>3</sup> *Id.*, ECF No. 223, PageID.15442.

<sup>4</sup> <https://static.nhtsa.gov/odi/tsbs/2023/MC-10248703-0001.pdf>

1 9. GM knew of the Shift Defect well before the time of sale for all Class Vehicles, as  
2 early as 2013. During GM's testing of an 8L vehicle, the down shift was described as a "neck  
3 snapper." Further evidence of GM's presale knowledge of the Shift Defect includes (1) continued  
4 prelaunch testing; (2) ongoing and above target warranty claims in MY15-MY18 8L vehicles, (3)  
5 records from the National Highway Traffic Safety Administration ("NHTSA"), (4) customer  
6 complaints posted on internet forums, (5) its own records of customers' complaints, (6) dealership  
7 repair records and requests for technical assistance, (7) customer surveys; (8) Service Bulletins, and  
8 (9) its Customer Satisfaction Program.

10 10. Despite GM's long-standing knowledge of the Shift Defect, it did not alert purchasers  
11 before (or after) their transactions, has not recalled the Class Vehicles to repair the defective  
12 transmissions.

13 11. Because of Defendant's misconduct, Plaintiffs and Class Members have been  
14 damaged: (1) at the point of sale by overpaying for the purchase of the Class Vehicles; (2) at the time  
15 of resale due to diminished resale prices; and (3) by receiving defective Vehicles which GM itself  
16 estimates would take over a thousand dollars to repair to get them close to targets for Gen 2.

### 18 JURISDICTION AND VENUE

19 12. This action is brought by Plaintiffs individually and on behalf a class of consumers  
20 in California. The value of injunctive relief sought by Plaintiffs exceeds the minimal jurisdiction  
21 limits of the Superior Court and will be established according to proof. The Court has jurisdiction  
22 over this action pursuant to California Constitution, Article VI, section 10. An actual controversy  
23 also exists for purposes of issuing declaratory and injunctive relief.

24 13. This Court has personal jurisdiction over Defendant because it is a Delaware  
25 corporation headquartered in Michigan and doing business in Orange County, with retail locations  
26 in this County. This Court has jurisdiction over Defendant because Defendant is either a citizen of  
27 California, has sufficient minimum contacts in California, or otherwise intentionally avails itself of  
28

1 the California market so as to render the exercise of jurisdiction over them by the California courts  
2 consistent with traditional notions of fair play and substantial justice.

3 14. Additionally, *California Civil Code* section 1780(d) allows actions commenced  
4 under the Consumers Legal Remedies Act to be filed in a county in which Defendant is doing  
5 business.

6 15. Venue is thus proper in this Court because Defendant does business in Orange  
7 County and because Plaintiffs purchased their vehicles in that county.

8 16. In addition, a substantial part of the events or omissions giving rise to these claims  
9 and a substantial part of the property which is the subject of this action are in this County. Pursuant  
10 to *California Civil Code* sections 1780(d), attached as Exhibit A is Plaintiff Matthew Barba's  
11 Declaration reflecting that a substantial part of property which is the subject of this action is situated  
12 in this County.

13 **THE PARTIES**

14 17. Plaintiff Matthew Barba is a citizen of California, domiciled in Anaheim, California.  
15 Plaintiff Barba purchased a new 2019 Chevrolet Silverado, manufactured by GM and containing an  
16 8L90 or 8L45 transmission, on or about December 28, 2019.

17 18. Plaintiff Renzo Calvo-Saez is a citizen of California, domiciled in Mission Viejo,  
18 California. Plaintiff Calvo-Saez purchased a new 2019 Chevrolet Silverado, manufactured by GM  
19 and containing an 8L90 or 8L45 transmission, on or about September 29, 2019.

20 19. Defendant General Motors, LLC was and is a Delaware limited Liability company  
21 with its principal place of business located in Detroit, Michigan. General Motors LLC, itself and  
22 through its corporate non-dealer affiliates, designs, manufactures, markets, distributes, services,  
23 repairs, and sells passenger vehicles, including the Class Vehicles, nationwide and in California.  
24 General Motors LLC is the warrantor and distributor of the Class Vehicles in the United States.

25 20. At all relevant times, Defendant was and is engaged in the business of designing,  
26 manufacturing, constructing, assembling, marketing, distributing, and selling automobiles and motor  
27 vehicle components in Michigan and throughout the United States of America.  
28

1 21. Plaintiffs are informed and believe, and thereon allege, each and all the acts and  
2 omissions alleged herein were performed by, or are attributable to, GM.

3 **FACTUAL ALLEGATIONS**

4 22. GM designs, manufactures, markets, distributes, and warrants automobiles in the  
5 United States sold under various brand names, including the Buick, Cadillac, Chevrolet, and GMC  
6 brands.

7 23. GM has many authorized dealerships across the State of California. GM authorizes  
8 these dealerships to sell GM vehicles, parts, and accessories and to service and repair GM vehicles  
9 using GM parts. These dealers play no role in the design or manufacturing of the Class Vehicles and  
10 are not parties to this action.

11 24. Since March 1, 2019, GM has designed, manufactured, distributed, and sold  
12 thousands of Class Vehicles, including the 2019 Sierra, Silverado, Canyon, and Colorado.

13 **A. Defective Eight-Speed Automatic Transmissions (GM 8L90 and 8L45)**

14 25. In January 2014, GM began marketing the release of a new, eight-speed automatic  
15 transmission to be included in some of its vehicles for model year 2015. GM-brand vehicles for model  
16 years 2014 and older had automatic transmissions of six or fewer speeds.

17 26. The engines in the Class Vehicles produce power and then send that power to the 8L90  
18 or 8L45 automatic transmission. The transmission then takes that power and delivers it to the rear  
19 drive transmissions of the Class Vehicle, while ensuring the engine stays within predetermined RPMs.  
20 The transmission also seeks to maximize the efficiency of the Class Vehicles' engines by balancing  
21 fuel consumption and torque.  
22

23 27. As background, transmissions use toothed gears which interact with each other to  
24 produce torque. The term "gear ratio" refers to the relationship between gears. For example, if an  
25 input gear has 20 teeth and it interacts with an output gear which has 10 teeth, the 10-tooth gear must  
26 spin twice to fully spin the 20-tooth gear. A gear ratio is then calculated by taking the number of teeth  
27  
28

1 on the output gear and dividing it by the input gear. In this example, the gear ratio would be 1:2  
2 (typically expressed as 0.5:1).

3 28. Automatic transmissions automate the switching of gears using multi-plate clutches,  
4 which adjust according to the speed the vehicle is traveling. Thus, instead of manually operating a  
5 clutch, the vehicle's transmission constantly monitors and engages and disengages gears according  
6 to the speed at which the vehicle is moving. This is done through the use of fluid pressure, which  
7 provides the necessary pressure to activate clutches and bands which in turn determines what gear to  
8 engage.  
9

10 29. GM marketed and sold its new eight-speed automatic transmissions as having "world-  
11 class performance" rivaling top performance vehicles, lightning-fast and smooth shifting, along with  
12 improved fuel efficiency, among other representations. (*See Speerly et al. v. General Motors, LLC*,  
13 Case No. 19-cv-11044 (E.D. Mich.) ("*Speerly v. GM*"), ECF No. 41-4, PageID. 3098-100).  
14

15 30. For instance, GM's own press release dated January 13, 2014 introduced the new 8L90  
16 transmission as being "tuned for world-class shift-response times," and "deliver[ing] shift  
17 performance that rivals the dual-clutch/semi-automatic transmissions found in many supercars – but  
18 with the smoothness and refinement that comes with a conventional automatic fitted with a torque  
19 converter." In addition, the technology and design of the new 8L90 transmission "help make the new  
20 [Corvette] Z06 surprisingly fuel efficient." (*See Speerly v. GM*, ECF No. 41-5, PageID 3102-06). GM  
21 touted similar characteristics for its 8L45 transmission in press releases in 2015. (*See Speerly v. GM*,  
22 ECF No. 41-6, PageID 3108-12; *Speerly v. GM*, ECF No. 41-7, PageID 3114-16).  
23

24 31. In another GM press release, GM continued to represent the high quality of the new  
25 eight-speed automatic transmission:

26 In fact, in the 2015 Corvette Stingray, [8L90 transmission] enables a class-leading 29-  
27 mpg EPA highway estimate – a 3.5-percent increase in fuel economy over the previous  
28 six-speed automatic – and a quicker 0-60 time of 3.7 seconds, all while delivering  
wide-open-throttle upshifts quicker than those of the dual-clutch transmission offered  
in the Porsche 911.

1 “GM’s new 8L90 eight-speed automatic represents a rare win-win-win scenario for  
2 customers,” said Kavoos Kaveh, global chief engineer for eight-speed automatic  
3 transmissions. “It offers greater performance and efficiency, while weighing less than  
4 the transmission it replaces. That’s a rare accomplishment in the industry today – and  
5 one for which GM has been awarded more than two dozen patents.”

6 \*\*\*\*\*

7 The lower engine speed reduces fuel consumption, while a new torque converter  
8 design enhances refinement, particularly during low-speed gear changes. “The  
9 Corvette’s new eight-speed automatic delivers the comfort and drivability of a true  
10 automatic transmission, as well as lightning-fast shifts and the manual control that  
11 enhance the performance-driving experience,” said Kaveh. “It was designed to  
12 enhance the driving experience, with performance on par with dual-clutch designs, but  
13 without sacrificing refinement. . . . Additionally, a torque converter design with a  
14 turbine damper complements performance with excellent refinement at low engine  
15 speeds.”

16 32. However, the 8L90 and 8L45 transmissions deliver anything but “comfort and  
17 drivability[,]” “lightning-fast shifts[,]” and “enhanc[ed] refinement, particularly during low-speed  
18 gear changes.” In fact, the Shift Defect in the 8L90 and 8L45 transmissions causes unsafe  
19 conditions, including, but not limited to, Class Vehicles suddenly lurching forward, sudden  
20 acceleration, delayed acceleration, and sudden loss of forward propulsion. These conditions present  
21 a safety hazard because they severely affect the driver’s ability to control the car’s speed,  
22 acceleration, and deceleration. As an example, these conditions may make it difficult to safely  
23 merge into traffic, back out of a garage or driveway, and drivers have reported sudden lurching into  
24 intersections when attempting to gradually accelerate from a stopped position and other dangerous  
25 driving conditions.

26 **B. GM’s Knowledge of the Shift Defect**

27 **1. GM Determined Before Class Vehicles Were Ever Sold There  
28 Was No Fix for the Shift Defect Until 2023.**

33. Prior to the sale of the Class Vehicles, GM knew about the Shift Defect based on: (1)  
similar issues with 2015-2018 MY vehicles equipped with first generation eight-speed automatic  
transmissions, which led GM to stop using those transmissions entirely in its performance and luxury

1 vehicles—like the later model year Corvette, Escalade, and Yukon—and develop a “second  
2 generation” transmission for vehicles beginning in the 2023 Model year; (2) GM’s exclusive  
3 knowledge of non-public, internal data about the Shift Defect, including pre-release testing data and  
4 warranty data, and investigations applying hazard metrics; (3) early consumer complaints about the  
5 Shift Defect to GM’s dealers who provide GM information about vehicle repairs; (4) aggregate data  
6 from GM’s dealers, including dealership repair orders; (5) consumer complaints to the National  
7 Highway Traffic Safety Administration (“NHTSA”) and resulting notice from NHTSA; (6) testing  
8 conducted in response to owner complaints; (7) GM service bulletins addressing shift issues in 2015-  
9 2019 MY vehicles equipped with the eight-speed transmission, as well as additional bulletins  
10 addressing shift issues in Class Vehicles; and (8) customer feedback survey from J.D. Power  
11 identifying drive quality and shifting as a weakness.  
12

13  
14 34. For example, as early as September 2014, GM knew the 8L90 and 8L45 transmissions  
15 were defective and also knew the Shift Defect would adversely affect the drivability of the Class  
16 Vehicles and cause safety hazards. GM’s testing of the 2014 of the Corvette revealed a down shift  
17 which GM testers described as a “neck snapper.”<sup>5</sup>

18 35. GM engineers knew harsh shifts affected drive quality during development and  
19 preproduction of the Corvette.<sup>6</sup> Those issues—along with first shift of the day, shudder, and lunges—  
20 were among the top five issues GM engineers faced in May 2014. The issues were so bad GM’s Chief  
21 Engineer for the Corvette even considered stopping production.<sup>7</sup> But GM did not stop production;  
22 instead, GM put the eight-speed transmission in hundreds of thousands of vehicles starting in 2015.  
23

24 36. From 2015 to 2019, the GM 8L transmission program was at “yellow” (concerned) or  
25 “red” (not confident: targets not met) due to issues related to the now fixed Shudder Defect as well  
26

27  
28 <sup>5</sup> *Speerly v. GM*, ECF No. 224-23, PageID.15661.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

1 as harsh shift issues due to the Shift Defect.<sup>8</sup> And while GM has fixed the Shudder Defect, it still  
2 hasn't fixed the Shift Defect—which has been a problem since 2014.

3 37. A GM engineer who worked on transmission calibration admitted his group should  
4 have informed management sooner about the Shift Defect for vehicles equipped first generation eight-  
5 speed transmissions.<sup>9</sup> The GM engineer stated: “Just sayin, we did not help ourselves when the  
6 opportunity was there. Of course nobody knew how had [sic] this POS was going to be, but blame  
7 can be assigned like a B24 bombing raid.”<sup>10</sup>

8  
9 38. In 2016, the president of Cadillac (Johan de Nysschen) reviewed dealer complaints  
10 related by customer. He summarized the 8L story bleakly:<sup>11</sup>

11  
12 The dealer anger at this multitude of issues, based on the dialogue at the meeting today, is exacerbated by their  
13 perception that

- 14 - we don't have fixes  
15 -we are telling customers it's "normal", there is no problem  
16 -we fix one thing, and hope it solves the problem  
17 -we fix one thing, then another goes wrong  
18 -we are trying to manage cost, not customer satisfaction  
19 -we are trying to avoid transmission replacement at all costs, even when justified  
20 -when all else fails, we buy back cars, yet still don't fix the problem for the next customer

21 39. From 2017 to 2021, the Shift Defect (and the Shudder Defect) prompted numerous  
22 investigative reviews.<sup>12</sup> But GM concealed the Shift Defect and misrepresented to consumers the poor  
23 shifts were “normal.”<sup>13</sup>

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26 <sup>8</sup> *Speerly v. GM*, ECF No. 223, PageID.15447.

27 <sup>9</sup> *Id.*

<sup>10</sup> *Id.* at PageID.15446-15447.

<sup>11</sup> *Speerly v. GM*, ECF No. 249-9, PageID.19572.

28 <sup>12</sup> *Id.* at PageID.15458.

<sup>13</sup> *Id.*

1 40. GM considered and rejected retrospective improvements for 2015 to 2017 models  
 2 because they would require a transmission replacement—a very expensive fix.<sup>14</sup> GM’s Mark Gordon  
 3 lamented in February 2019 “shift quality issues are an ongoing concern with the 8 Speed transmission.  
 4 Unfortunately, these issues have been through an Op-ex and a service solution is not going to be  
 5 developed due to cost.”<sup>15</sup> A year later, in 2020, Gordon reported “unfortunately” shift quality  
 6 complaints in Class Vehicles continued to increase and would only stop once the Gen 2 redesign was  
 7 completed—information he warned was “(GM Confidential).”<sup>16</sup>

9 41. Assistant Chief Engineer Bill Goodrich who helped develop and validate the 8L  
 10 transmission, appeared at auto shows to brag about 8L transmission performance in Class Vehicles  
 11 without disclosing the Shift Defects or the crushing warranty rates.<sup>17</sup>

12 42. A comparison of the Class Vehicles with the 8L transmissions and the same models  
 13 with other transmissions showed the 8L equipped vehicles had repairs per thousand vehicles at orders  
 14 of magnitude higher<sup>18</sup>:

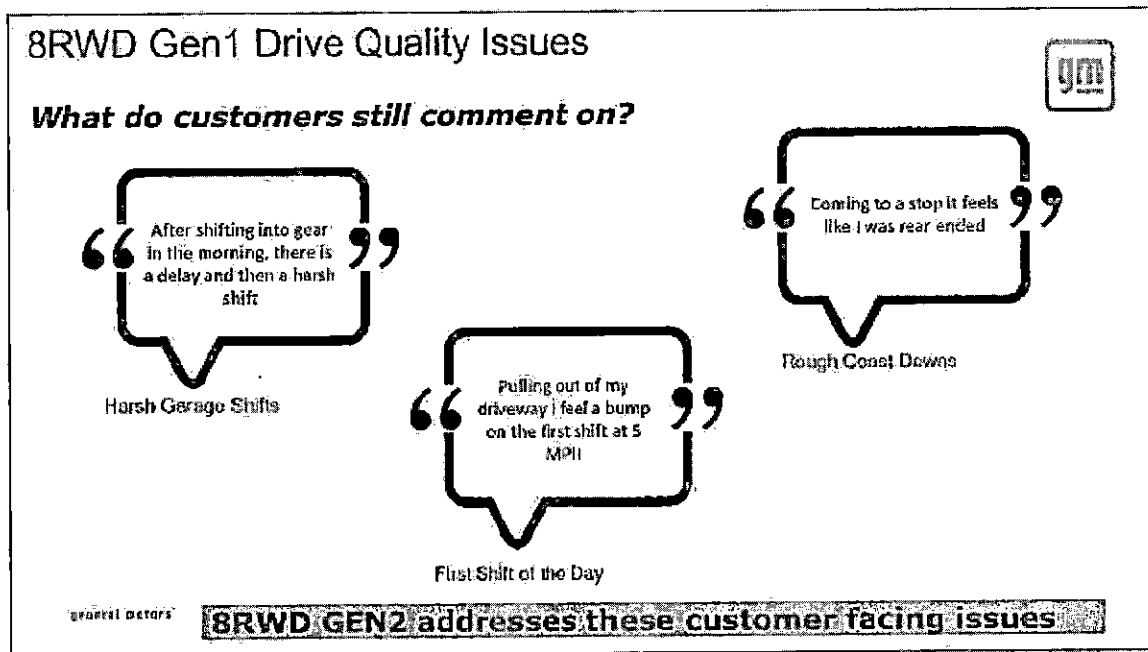
TRANSMISSION TYPE	MSU	MSX	MYC	MYD (MY 2015 NOT 2014)	MY6 (MY 2018 NOT 2016)	MY7 (MY 2015 NOT 2014)
MY 2014 @ 12 MIS	ABOUT 25 RPTV	ABOUT 35 RPTV	LESS THAN 3 RPTV	LESS THAN 1.2 RPTV	NA	LESS THAN 5 RPTV
MY 2014 @ 24 MIS	ABOUT 50 RPTV	ABOUT 65 RPTV	LESS THAN 3 RPTV	LESS THAN 1.2 RPTV	NA	LESS THAN 5 RPTV
MY 2014 @ 36 MIS	ABOUT 65 RPTV	ABOUT 100 RPTV	LESS THAN 3 RPTV	LESS THAN 1.2 RPTV	NA	LESS THAN 5 RPTV
MY 2014 @ 48 MIS	ABOUT 60 RPTV	ABOUT 109 RPTV	LESS THAN 3 RPTV	LESS THAN 1.2 RPTV	NA	LESS THAN 5 RPTV
MY 2014 @ 60 MIS	ABOUT 82 RPTV	NA	LESS THAN 3 RPTV	LESS THAN 1.2 RPTV	NA	LESS THAN 5 RPTV
MY 2016 @ 12 MIS	ABOUT 10 RPTV	ABOUT 10 RPTV	LESS THAN 3 RPTV	LESS THAN 2 RPTV	LESS THAN 5 RPTV	LESS THAN 5 RPTV
MY 2016 @ 24 MIS	ABOUT 20 RPTV	ABOUT 20 RPTV	LESS THAN 3 RPTV	LESS THAN 2 RPTV	ABOUT 6 RPTV	LESS THAN 5 RPTV
MY 2016 @ 36 MIS	ABOUT 31 RPTV	ABOUT 31 RPTV	LESS THAN 3 RPTV	LESS THAN 2 RPTV	NA	LESS THAN 5 RPTV
MY 2016 @ 48 MIS	ABOUT 35 RPTV	ABOUT 35 RPTV	LESS THAN 3 RPTV	ABOUT 2 RPTV	NA	LESS THAN 5 RPTV
MY 2016 @ 60 MIS	NA	ABOUT RPTV	LESS THAN 3 RPTV	NA	NA	NA

24 Table 3. Selected 8LXX Harsh Shift Complaint Rates By Model and MY.

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 27 <sup>14</sup> *Id.* at PageID.15447.  
 28 <sup>15</sup> *Id.*  
<sup>16</sup> *Id.*  
<sup>17</sup> ECF No. 224-17, PageID.15633-37.  
<sup>18</sup> *Id.* at PageID.15442.

1 43. The unresolved nature of the Shift Defect in GM’s eight-speed transmissions is further  
2 corroborated by GM’s own documents. As noted, the documents show a redesign is needed to address  
3 “Alleged Lunge/Lurch/Hesitation Upon Shifting” as “incremental fixes” to both hardware and  
4 calibration from MY 2016-2020 to “improve warranty and customer satisfaction,” but that  
5 “[u]ltimately, some of the issues could not be resolved without a major redesign of the transmission,  
6 **which was approved in early 2018 (8RWD Gen 2).**”<sup>19</sup>

8 44. Further, GM documents from 2021 make it clear the Shift Defect is “still” something  
9 customers are dealing with, including harsh garage shifts, harsh first shift of the day, and rough coast  
10 downs. GM knew the Gen 2 transmission redesign will be what ultimately “addresses these customer  
11 facing issues” including<sup>20</sup>:



24 45. The redesign comes too late for purchasers of the Class Vehicles. They will be left  
25 with cars of lower value, with no clear repair, and not what they bargained for.

28 <sup>19</sup> ECF No. 173-5, PageID.5934 (emphasis added).

<sup>20</sup> *Speerly v. GM*, ECF No. 209-7, PageID.12936.

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**2. GM’s Service Bulletins Demonstrate Its Knowledge of the Shift Defect as Early as 2014, and a Continuing Design Defect.**

46. From September 2014 to at least February 2019, GM issued many service bulletins and service bulletin updates to its dealers in the United States, but not its customers, acknowledging problems of harsh shifting, jerking, clunking, and delays in acceleration or deceleration relating to the 8L90 and 8L45 transmissions. As with its customers, GM did not disclose the 8L transmission design defects to its dealers.

**a. Service Bulletin 14-07-30-001**

47. On or around September 1, 2014, GM issued Service Bulletin 14-07-30-001 with the subject “Information on Transmission Adaptive Functions.” This bulletin applied to the following vehicle models equipped with 8L90 transmissions (RPO M5U): 2015 Cadillac Escalade, 2015 Cadillac Escalade ESV, 2015 Chevrolet Corvette, and 2015 GMC Yukon. In the bulletin, GM stated “[s]ome customers may comment on low mileage vehicles with automatic transmission that shift feel to be too firm (harsh) or may slip or flare. Customers should be advised that the transmission makes use of an adaptive function that will help to refine the shift feel while driving and improve shift quality.” The bulletin also included description of transmission’s adaptive learning functions and a section titled “How to Adapt Your Transmission” containing GM’s instructions to train the adaptive learn process “for a concern with a 1-2 upshift” and “for a concern with a 3-1 coastdown (closed throttle) shift.”

48. From October 2014 to October 2018, GM subsequently issued seven updates to Service Bulletin 14-07-30-001, numbered 14-07-30-001A through 14-07-30-001G.

49. On or around October 8, 2014, GM issued Service Bulletin 14-07-30-001A with the same subject and covered vehicles listed on the previous version. In this bulletin, GM again noted “[s]ome customers may comment on low mileage vehicles with automatic transmission that shift feel to be too firm (harsh) or may slip or flare.” This revised bulletin was issued to provide updated

1 information in the “How to Adapt Your Transmission” section, including a chart of shifts and their  
2 corresponding clutches, along with new, more detailed instructions to train the adaptive learn process  
3 for each of these clutches.

4 50. On or around December 1, 2014, GM issued Service Bulletin 14-07-30-001B with the  
5 subject “Information on Transmission Adaptive Functions and Correcting Low Mileage HarshShift.”  
6 In addition to the vehicles listed on the previous versions of this bulletin, the following models  
7 equipped with 8L90 transmissions were added: 2015 Chevrolet Silverado, 2015 GMC Sierras, and  
8 2015 GMC Yukon XLs. The revised bulletin also included instructions for resetting and “relearning”  
9 transmission adapts using diagnostic software (“Transmission Adaptive Values Learn procedure  
10 through GDS 2”) instead of performing the adaptive instructions while driving the vehicle but noted  
11 the software function would not resolve the issue in 2015 Corvettes built before September 29, 2014,  
12 which “must be driven to learn the adapts.”  
13

14 15 51. On or about January 27, 2015, GM issued Service Bulletin 14-07-30-001C with the  
16 same subject, the same covered vehicles, and substantially the same information included in the  
17 previous version. However, this revised version added a note to the “How to Adapt Your  
18 Transmission” section stating “[t]he transmission fluid temperature must be between 75°C (167°F)  
19 and 85°C (185°F) during the drive procedure or adapts will not be learned.”  
20

21 52. On or about May 7, 2015, GM issued Service Bulletin 14-07-30-001D with the same  
22 subject and covered vehicles listed on the previous version. In this revised bulletin, GM provided  
23 updated instructions for resetting and “relearning” transmission adapts using different diagnostic  
24 software, the Transmission Service Fast Learn procedure through GDS 2, as opposed to the  
25 Transmission Adaptive Values Learn procedure in previous bulletins.

26 53. On or about July 27, 2015, GM issued Service Bulletin 14-07-30-001E with the same  
27 subject and covered vehicles listed on the previous version. It also included substantially the same  
28 instructions for resetting and “relearning” transmission adapts. However, this revised bulletin

1 included new information explicitly acknowledging the Warranty applied to the transmission repair,  
2 stating: “Warranty Information. For vehicles repaired under the Powertrain coverage, use the  
3 following labor operation. Reference the Applicable Warranties section of Investigate Vehicle  
4 History (IVH) for coverage information,” and listing the applicable labor code as 8480318.

5  
6 54. On or about March 4, 2016, GM issued Service Bulletin 14-07-30-001F with the same  
7 subject and covered vehicles listed on the previous version. This revised bulletin repeated “[s]ome  
8 customers may comment on low mileage vehicles with automatic transmission that shift feel to be  
9 too firm (harsh) or may slip or flare” but added “[c]learing the shift adapts without performing a  
10 Service Fast Learn should not be considered a repair procedure as the transmission will simply relearn  
11 the previous settings.” The bulletin then proceeded to outline more detailed instructions “to determine  
12 what steps should be followed” to diagnose and perform the recommended “relearn” functions to  
13 adapt the clutches. However, like the previous version, this bulletin explicitly acknowledged the  
14 Warranty applied to the transmission repair, stating: “Warranty Information. For vehicles repaired  
15 under the Powertrain coverage, use the following labor operation. Reference the Applicable  
16 Warranties section of Investigate Vehicle History (IVH) for coverage information,” and listing the  
17 applicable labor code as 8480318.

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19 55. On or about March 3, 2017, GM issued Service Bulletin 14-07-30-001G with the same  
20 subject as the previous version. However, this revised bulletin applied only to 2015 Chevrolet  
21 Corvettes equipped with 8L90 transmissions (RPO M5U) and instructed GM technicians, “For all  
22 truck and utility applications with the 8L90 automatic transmission, refer to 16-NA-411 for the latest  
23 information for correcting low mileage harsh shifts.” This revised bulletin’s substantive information,  
24 including the service instructions and warranty information, otherwise remained the same as the  
25 previous version.  
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**b. Service Bulletin 14876**

56. In or around December 2014, GM Issued Service Bulletin 14876 with the subject “Service Update for Inventory Vehicles Only 8-speed Transmission Harsh Shift.” Under the section titled “Purpose,” GM stated “[o]n certain 2015 model year Cadillac Escalade, Cadillac Escalade ESV, Chevrolet Corvette, Chevrolet Silverado Double Cab and Crew Cab, GMC Sierra Double Cab and Crew Cab, GMC Yukon and GMC Yukon XL vehicles equipped with 8-speed automatic transmission (M5U), the customer may complain about harsh shifting. This could occur if the vehicle experienced multiple transmission reprogramming events during manufacturing, causing the calibration to over-adjust the shift parameters. This bulletin provides a service adaptive learn procedure that should be run to reset the calibration to the baseline parameters.”

**c. Service Bulletin 15-NA-007**

57. On or around September 15, 2015, GM issued Service Bulletin 15-NA-007 in response to customer complaints reporting conditions such as delayed engagement, “Firm garage shifts, Park to Drive or Park to Reverse after the vehicle has be [sic] sitting for several hours with the engine off,” a clunking noise when the engine starts, and/or an illuminated malfunction lamp relating to diagnostic transmission code P16F3. This bulletin applied to the following vehicle models equipped with 8L90 transmissions (RPO M5U): 2015 Cadillac Escalade, 2015 Chevrolet Silverado, 2015 GMC Sierra, 2015 GMC Yukon and included directions regarding a software update and programming the transmission control module (“TCM”).

58. GM re-issued three updates to this service bulletin. On or around September 30, 2015, “delayed engagement” was removed from the subject. On or around October 21, 2015, the bulletin was expanded to cover the 2015 Chevrolet Corvette. On or around January 22, 2016, the bulletin was expanded to cover the 2016 model years for the vehicles listed in the original bulletin.

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**d. Service Bulletin 16-NA-014**

59. On or around January 21, 2016, GM issued Service Bulletin 16-NA-014 with the subject “Delayed Engagement After Sitting With Engine Off.” This bulletin applied to the following vehicle models equipped with an 8L45 or 8L90 transmission: 2015-2016 Cadillac Escalade, 2016 Cadillac Escalade ESV, 2016 Cadillac ATS, 2016 Cadillac CTS, 2015-2016 Chevrolet Corvette, 2015-2016 Chevrolet Silverado, 2015-2016 GMC Sierra, 2015-2016 GMC Yukon and 2015-2016 GMC Yukon XL. In the bulletin, GM stated “[s]ome customers may comment on a condition of delayed engagement when the transmission is shifted from Park to Reverse or Park to Drive after the vehicle has been sitting with the engine off. This condition may typically occur after several hours or more commonly overnight.” GM’s recommended correction was to “[i]ninstall a new stator shaft support assembly.

60. GM issued an update on or around April 22, 2016 to update part numbers.

61. On or around June 16, 2016, GM issued an update to clarify the reported condition, to identify the cause of the reported condition, and to add diagnostic procedures for the C5 clutch and torque converter. Specifically, GM stated “[t]his condition may be caused by the torque converter draining the transmission fluid back into the transmission pan.” Additionally, GM advised customers may describe the reported condition as follows:

- Vehicle delaying into gear.
- Not wanting to move.
- Feeling like the transmission is slipping.
- Delayed engagement followed by a harsh engagement.

62. On or around November 17, 2016, GM issued an update to clarify the applicable vehicle models and provide more detailed repair or diagnostic procedures. The updated bulletin applied to the following vehicle models within the VIN range identified in the bulletin: vehicles equipped with an 8L45 or 8L90 transmission: 2015-2016 Cadillac ATS, 2015-2016 Cadillac CTS;

1 vehicles equipped with an 8L45 transmission: 2015-2016 Chevrolet Camaros with a 3.6L engine and  
2 VIN on or before September 28, 2015, 2015-2016 Chevrolet Camaros with a 2.0L engine and VIN  
3 on or before November 9, 2019; vehicles equipped with an 8L90 transmission: 2015-2016 Cadillac  
4 Escalade, 2015-2016 Cadillac Escalade ESV, 2015-2016 Chevrolet Camaro, 2015-2016 Chevrolet  
5 Corvette, 2015-2016 Chevrolet Silverado, 2015-2016 GMC Sierra, 2015-2016 GMC Yukon, and  
6 2015-2016 GMC Yukon XL. GM's recommended correction was to replace parts of the transmission  
7 and/or the transmission pan, depending on the symptoms described by the customer. Like PIE0353  
8 and later versions of 14-07-30-001, this bulletin update included a "Warranty Information" section  
9 with a specific Labor Operation code.

11 e. **Service Bulletin 16-NA-019**

12 63. On or around January 25, 2016, GM issued Service Bulletin 16-NA-019 with the  
13 subject "Information on Transmission Adaptive Functions and Correcting Low Mileage Harsh Shifts,  
14 Slips, or Flares." This bulletin applied to all 2016 passenger cars and trucks under the Buick, Cadillac,  
15 Chevrolet, or GMC brands equipped with 8L90 or 8L45 automatic transmissions (RPOs M5U, M5T,  
16 M5N, M5X). Under the "Condition" section of this bulletin, GM stated, "[s]ome may comment on  
17 low mileage vehicles with an automatic transmissions [sic] that they shifting may feel too firm  
18 (harsh), slips, or flares. Customers should be advised that the transmission makes use of an adaptive  
19 function that will help to refine the shift feel while driving and improve shift quality." The bulletin  
20 also included description of transmission's adaptive learning functions and instructions for resetting  
21 and "relearning" transmission adapts. Like PIE0353 and later versions of 14-07-30-001, this bulletin  
22 update included a "Warranty Information" section with a specific Labor Operation code.

23 64. On or around August 19, 2016, GM issued an update to Service Bulletin 16-NA-019  
24 as 16-NA-019A with "[a]dded 2017 Model Year and updated information." Specifically, the bulletin  
25 directed GM technicians to "check the ECM/TCM Software/Calibrations against what's currently in  
26 the vehicle and if the description of the update is relevant to the customer concern please perform the  
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1 update prior to proceeding with the learns” outlined in the revised bulletin. The revised bulletin  
2 included the same “Warranty Information” section as the original bulletin.

3 **f. Service Bulletin 16-NA-213**

4 65. On or around June 28, 2016, GM issued yet another Service Bulletin to address  
5 consumer comments “that the transmission has developed a harsh shift.” This bulletin, 16-NA-213,  
6 applied to the following vehicle models equipped with an 8L90 or 8L45 transmission (RPOs M5U,  
7 M5T, M5N) built between July 1, 2015 to September 14, 2015: 2015-2016 Cadillac Escalade, 2015-  
8 2016 Cadillac ATS, ATS V, CTS, CTS V, 2015-2016 Chevrolet Corvette, 2015-2016 Chevrolet  
9 Silverado, and 2015-2016 GMC Sierra. The bulletin specifically noted “there may be more than one  
10 shift that is harsh” and further noted some transmissions, those with “a suspect Clutch Control  
11 Solenoid,” should have the valve body replaced.  
12

13 **g. Service Bulletin PIP5437**

14 66. On or around November 8, 2016, GM issued another service bulletin to address the  
15 ongoing, unremedied Shift Defect. This bulletin, PIP5437, was titled “8L45 8L90 Diagnostic Tips for  
16 Harsh Shifts” to address consumer comments that “the transmission in their vehicle is not shifting  
17 correctly.” The bulletin applied to the following vehicle models equipped with an 8L90 or 8L45  
18 transmission: 2015-2016 Cadillac Escalade, 2016 Cadillac Escalade ESV, 2016 Cadillac ATS, ATS-  
19 V, CTS, and CTS-V, 2015-2017 Chevrolet Corvette, 2015-2017 Chevrolet Silverado, 2016-2017  
20 Chevrolet Camaro, 2015-2017 GMC Sierra, and 2015-2017 GMC Yukon. The bulletin directed  
21 technicians to use software to identify the shift problems and to perform a drive learn procedure on  
22 low-mileage vehicles. On higher mileage vehicles, the bulletin instructed technicians to remove the  
23 transmission fluid pan and inspect for debris. Technicians were further instructed, “if debris is found  
24 the transmission should be disassembled for root cause and repairs. If excessive debris is not found  
25 the valve body should be replaced.” This bulletin was updated on or around November 14, 2016 to  
26 cover additional vehicle models equipped with an 8L90 or 8L45 transmission, namely 2017 Cadillac  
27  
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1 Escalade, 2017 Cadillac Escalade ESV, and 2017 Cadillac ATS, ATS-V, CTS, and CTS-V.

2 **h. Service Bulletin 16-NA-361**

3 67. Since 2016, GM has issued Service Bulletin 16-NA-361.



Bulletin No.: 16-NA-361

Date: Apr-2017

4 **Service Bulletin**

5 **INFORMATION**

6 **Subject:** Information on Transmission Harsh 1-2 Shift Upon First Start Up/Shift of the Day Under Light Throttle

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Brand:	Model:	Model Year:		VIN:		Engine:	Transmission:
		from	to	from	to		
Cadillac	ATS	2016	2017				Automatic 8L45, 8L90 (M5T, M5N, MSU, MSX)
	CTS Models						
	CTS						
	Escalade Models	2015					
Chevrolet	Camaro	2016	2017				
	Corvette	2015	2017				
	Silverado						
GMC	Sierra	2015	2017				Automatic 8L90 (MSU, MSX)
	Yukon						

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Involved Region or Country	North America and N.A. Export Regions
Condition	Some customers may comment that the transmission exhibits a harsh 1-2 shift on the first shift of the day, typically under light throttle.
Cause	This condition is due to the initial clutch fill time of the 2-3-4-6-8 (C4) clutch.
Information	Some customers may experience a flare condition on the first 1-2 shift of the day or after the vehicle has been parked for several hours. The condition may have developed after the replacement of a complete transmission assembly or the replacement of the stator support to correct a delayed engagement condition. This is most likely to occur under light throttle conditions. Subsequent 1-2 shifts have acceptable shift feel. Replacing transmission components will not correct the condition.

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<b>Correction</b>	<p><b>Important:</b> Replacing transmission components or complete assemblies will not improve the condition. The first 1-2 shift of the day may be harsh. The customers' vehicle should be compared to a like vehicle under the same driving conditions. Do Not replace any parts for this condition.</p> <p><b>Note:</b> This condition will not impact the designed performance or reliability of the vehicle.</p>
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<b>Version</b>	3
<b>Modified</b>	<p>Nov. 18, 2016 - Revised the Cause section.</p> <p>April 6, 2017 - Added models and Revised the Condition, Cause and Correction sections.</p>

GM bulletins are intended for use by professional technicians. NOT a "do-it-yourselfer". They are written to inform these technicians of conditions that may occur on some vehicles, or to provide information that could assist in the proper service of a vehicle. Properly trained technicians have the equipment, tools, safety instructions, and know-how to do a job properly and safely. If a condition is described, DO NOT assume that the bulletin applies to your vehicle, or that your vehicle will have that condition. See your GM dealer for information on whether your vehicle may benefit from the information.



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68. Significantly, *this same bulletin has been updated nearly every year simply to add more model years. See, e.g., 16-NA-361, August 2020, accessible at <https://static.nhtsa.gov/odi/tsbs/2020/MC-10180293-9999.pdf>; (including up to 2021 models).*

69. Thus, GM has been issuing a technical service bulletin for a Shift Defect for over six years, directing dealers to do no service. GM knows the Shift Defect cannot be fixed by replacing components, or even complete assemblies, because they are equally defective. GM knows it is selling vehicles with a Shift Defect.

**i. Service Bulletin 16-NA-411**

70. On or around January 20, 2017, GM issued Service Bulletin 16-NA-411 to provide GM technicians with yet another a procedure to reprogram the ECM and TCM to correct ongoing complaints relating to the Shift Defect. This bulletin applied to the following vehicle models equipped with an 8L90 transmission: 2015-2016 Cadillac Escalade models; 2015-2016 Chevrolet Silverado, 2015-2016 GMC Sierra, and 2015-2016 GMC Yukon models. Specifically, the bulletin addressed the following consumer comments on the following conditions:

- 1 • Harsh 1-2 upshift (except for the first 1-2 upshift of the day)
- 2 • Harsh 3-1 downshift when de-accelerating to a stop
- 3 • Harsh downshift under heavy throttle apply
- 4 • Active Fuel Management (AFM) V4 to V8 transition harshness
- 5 • Coast down downshifts

6 71. Notably, the bulletin specifically acknowledged:

8 The new ECM and TCM software will not improve the following conditions and  
9 should not be installed for any of the following conditions:

- 10 • Shift quality of the first 1-2 shift of the day
- 11 • Power-On lift foot upshifts (Heavy throttle application followed by a closed throttle  
12 application which results in a transmission up shift)
- 13 • Delayed/slow engagement (Refer to Bulletins 16-NA-014 and 16-NA-364)
- 14 • TCC Shudder (Refer to PIP5337 and Bulletin 16-NA-175)
- 15 • Engine or Chassis induced vibrations
- 16 • Fuel Economy

17 **j. Service Bulletin 16-NA-404**

18 72. On or around April 7, 2017, GM issued Service Bulletin 16-NA-404 to provide GM  
19 technicians with another procedure to reprogram the TCM to correct the diagnostic transmission code  
20 set relating to the same complaints reiterated above arising from the Shift Defect. This bulletin applied  
21 to the following vehicle models equipped with an 8L45 and 8L90 transmissions (M5T, M5N, M5U,  
22 M5X): 2017 Cadillacs ATS and CTS built before December 6, 2016; 2017 Cadillacs CT6 (Excluding  
23 RPO I16) built before November 17, 2016; 2017 Cadillacs Escalade built before December 16, 2016;  
24 2017 Chevrolet Camaro built before December 6, 2016; 2017 Chevrolet Corvette built before  
25 December 8, 2016; 2017 Chevrolet Silverado built before December 16, 2016; 2017 Chevrolet  
26 Suburban (excluding RPO I16) built before December 16, 2016; 2017 Chevrolet Tahoe (Excluding  
27 RPO I16) built before December 16, 2016; 2017 Chevrolet Tahoe (Excluding  
28 RPO I16) built before December 16, 2016. It also applied the following vehicles built before

1 December 16, 2016 and equipped with automatic 8L90 transmissions (M5U, M5X): 2017 GMC  
2 Sierra and 2017 GMC Yukon (excluding RPO I16). The bulletin addressed the following consumer  
3 complaints reporting:

- 4 • Harsh shift
- 5 • Delayed shift
- 6 • Unwanted downshift
- 7 • Transmission stuck in one gear
- 8 • Erratic shifting
- 9 • Hesitation between shifts
- 10 • MIL illuminated

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12 **k. Service Bulletin 20-NA-187**

13 73. On or around September 2020, GM issued service bulletin 20-NA-187 with the subject  
14 line “Delayed and/or Harsh Engagement of Transmission Shift After Vehicle Sitting with Engine  
15 Off.” This bulletin applied to 2018-2021 MY Camaro and Colorado vehicles; 2018-2019 Corvette  
16 and Silverado vehicles; 2018-2019 Cadillac ATS, CTS, and CT6 vehicles; as well as GMC Canyon  
17 vehicles for 2018-2021 and Sierra vehicles for 2019-2021. It also applied to additional vehicles going  
18 back to 2018. The bulletin notes “[s]ome customers may comment on a condition of delayed  
19 engagement when the transmission is shifted from Park to Reverse or Park to Drive after the vehicle  
20 has been sitting with the engine off,” and also notes customers “may describe this condition as . . .  
21 [v]ehicle delaying into gear,” “[f]eeling like the transmission is slipping,” and/or “[d]elayed  
22 engagement followed by a harsh engagement.”  
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25 **3. Consumer Complaints to NHTSA Demonstrate Consumers**  
26 **Have Complained about the Shift Defect Since 2015 to the**  
27 **Present.**

28 74. Federal law requires automakers like GM to be in close contact with NHTSA regarding potential auto defects, including imposing a legal requirement (backed by criminal

1 penalties) compelling the confidential disclosure of defects and related data by automakers to  
2 NHTSA, including field reports, customer complaints, and warranty data. *See* TREAD Act, Pub. L.  
3 No. 106-414, 114 Stat. 1800 (2000).

4 75. Under information and belief, GM personal communicate with NHTSA and review  
5 complaints on the website as part of GM’s open investigation review process.

6 76. Automakers have a legal obligation to identify and report emerging safety-related  
7 defects to NHTSA under the Early Warning Report requirements. *Id.* Similarly, automakers monitor  
8 NHTSA databases for consumer complaints regarding their automobiles as part of their ongoing  
9 obligation to identify potential defects in their vehicles, including safety-related defects. *Id.* Thus,  
10 GM knew or should have known of the many complaints about the Shift Defect logged by NHTSA  
11 ODI, and the content, consistency, and large number of those complaints alerted, or should have  
12 alerted, GM to the Shift Defect.  
13

14 77. Complaints which owners filed with the NHTSA demonstrate the defect is widespread  
15 and dangerous and also demonstrate it manifests without warning. The complaints go back to 2015  
16 and include some models which no longer have the 8L transmissions, such as Escalades and Yukons.  
17 The complaints indicate GM’s awareness of the problems with the transmission and how potentially  
18 dangerous the defective condition is for consumers. The complaints also indicate how often GM  
19 dealers and service technicians passed along to customers what GM told them: the symptoms of the  
20 Shift Defect—harsh shifts which involve jerking, lurching, and/or hesitations—were “normal.” The  
21 following is just a small sampling of the hundreds of safety-related complaints describing the Shift  
22 Defect (spelling and grammar mistakes remain as found in the original) (National Highway Traffic  
23 Safety Administration, Safety Issues & Recalls, <http://www-odi.nhtsa.dot.gov/complaints/>).

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26 **a. Chevrolet Silverado**

27 78. On November 20, 2015, the following incident was reported as to a 2015 Chevrolet  
28 Silverado:

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TRANSMISSION CANNOT FIND GEARS WHEN COASTING OR SLOWING DOWN AND THEN HITTING ACCELERATOR. VERY DANGEROUS WHEN IT HESITATES FOR SECONDS BEFORE FINDING THE RIGHT GEAR AND GOING, OR IT STAYS IN TOO HIGH OF A GEAR INSTEAD OF DOWNSHIFTING TO ACCELERATE AND RATTLES. HAPPENS EVERY TIME I DRIVE THE TRUCK, AND MANY OTHER PEOPLE HAVE THE SAME ISSUE. GM DOESN'T CARE!

79. Another incident involving a Chevrolet Silverado was reported on April 6, 2016:

HAD BEEN COMPLAINING SINCE 2 DAYS AFTER PURCHASE THAT TRANSMISSION WAS SHAKING/SHIMMYING/SPUTTERING. WAS PULLING ONTO A COUNTY HIGHWAY OFF OF A RESIDENTIAL TYPE ROAD (AFTER PICKING UP GRANDDAUGHTER FROM SCHOOL - SHE WAS IN TRUCK) AND TRUCK BOGGED DOWN & WOULDN'T GO. INTERSECTION IS AT TOP OF HILL AND AROUND A CORNER. WAS CLEAR WHEN I STARTED PULLING OUT, BUT WAS ALMOST HIT BY ONCOMING TRUCK BEFORE I GOT MY TRUCK TO GET ON ACROSS THE INTERSECTION. HAS BEEN IN SHOP TWICE TO FIX IT. FIRST TIME TO DOUBLE TRANSMISSION FLUSH. THAT DIDN'T WORK. NEXT TIME A FEW WEEKS LATER, A TECHNICIAN HOOKED UP A COMPUTER TO MY TRUCK SO HE COULD MANUALLY SHIFT GEARS WHILE RIDING WITH ME. HE FELT THE ISSUES AND SAID HE SAW SEVERAL PROBLEMS. DEALERSHIP ENDED UP REPLACING TORQUE CONVERTER. ALSO REPLACED VLOM MANIFOLD - WHATEVER THAT IS? THAT'S WHAT IT SAYS ON WORK ORDER. THE PROBLEM STILL EXISTS. I BELIEVE THERE ARE BULLETINS OUT ON THIS TRUCK'S TRANSMISSION ALREADY. I HAVE TALKED TO OTHERS WHO HAVE HAD THE SAME PROBLEM.

80. Another incident involving a Chevrolet Silverado was reported on May 12, 2016:

TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO 1500. WHILE DRIVING 30 MPH, THE VEHICLE DOWNSHIFTED UNCONTROLLABLY WITHOUT WARNING. ALSO, WHILE IN THE PARK POSITION, THE VEHICLE SUDDENLY LUNGED FORWARD AND HAD TO BE RESTARTED. THE CONTACT STATED THAT THE TRANSMISSION INDEPENDENTLY ENGAGED INTO FIRST GEAR WITHOUT WARNING AND CAUSED THE VEHICLE TO SHIFT FORWARD ON MORE THAN ONE OCCASION. THE VEHICLE RECEIVED AN UNKNOWN REPAIR, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 14,000. ....UPDATED 0711/16 \*BF

81. Another incident involving a Chevrolet Silverado was reported on August 8, 2016:

TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO 1500. UPON DEPRESSING THE ACCELERATOR PEDAL, THE VEHICLE WAS EXTREMELY SLOW TO ACCELERATE WITH A DRASTIC REDUCTION IN SPEED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO TWO DEALERS WHO WERE UNABLE TO REPLICATE AND DIAGNOSE THE

1 FAILURE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND  
2 PROVIDED NO RECOMMENDATION OR REPAIR SOLUTION. THE FAILURE  
MILEAGE WAS NOT AVAILABLE.

3 82. Another incident involving a Chevrolet Silverado was reported on August 20, 2016:

4 THE TRANSMISSION HESITATES WHEN SHIFTING IN AUTOMATIC BUT  
5 WHEN IN MANUAL MODE IT SHIFTS FINE WITH NO ISSUES. THIS HAS  
6 BEEN A ON GOING ISSUE AND PROBLEM THE SERVICE CENTER FOR A  
7 LOCAL DEALERSHIP CAN NOT FIND THE ISSUE. BUT THERE IS  
SOMETHING GOING ON WITH THE TRANSMISSION.

8 83. Another incident involving a Chevrolet Silverado was reported on September 14,  
9 2016:

10 TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO 1500. WHILE  
11 DRIVING 10 MPH, THE ACCELERATOR PEDAL WAS DEPRESSED AND THE  
12 VEHICLE ACCELERATED IN EXCESS. THE VEHICLE WAS TAKEN TO A  
13 DEALER WHERE IT WAS DIAGNOSED THAT THE WIRING HARNESS, PART  
14 OF THE TRANSMISSION, AND MULTIPLE OTHER PARTS NEEDED TO BE  
15 REPLACED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE  
16 RECURRED. IN ADDITION, WHILE DRIVING AT A VERY LOW SPEED,  
"HAUL GEARS" DISPLAYED ON THE MESSAGE BOARD AS THE VEHICLE  
SWITCHED INTO A LOW GEAR INDEPENDENTLY. THE MANUFACTURER  
WAS NOTIFIED OF THE FAILURES. THE FAILURE MILEAGE WAS 3,000.  
THE VIN WAS UNAVAILABLE.

17 84. Another incident involving a Chevrolet Silverado was reported on September 26,  
18 2016:

19 I PARK IN A 5 LEVEL PARKING GARAGE. SEVERAL MONTHS AGO, I WAS  
20 LEAVING WHEN I CAME UP TO THE RAMP TO THE NEXT LOWER LEVEL.  
21 I LET OFF ON THE ACCELERATOR BEFORE I WENT FROM FLAT TO  
22 LOWERING RAMP. THE TRUCK SHIFTED UP TO SECOND GEAR,  
23 ACCELERATED AND THROUGH ME TOWARD THE VEHICLE IN FRONT.  
24 THE TRUCK WENT OUT OF MY CONTROL. IF I WERE NOT A SAFE DRIVER  
I WOULD HAVE STRUCK THE VEHICLE. THIS ISSUE HAS OCCURRED  
ANOTHER TIME AS WELL. THERE HAVE BEEN OTHER PROBLEMS WHICH  
ARE NUMEROUS. I WILL ADDRESS THEM INDIVIDUAL IN FURTHER  
COMPLAINTS.

25 85. Another incident involving a Chevrolet Silverado was reported on September 27,  
26 2016:

27 ON SEPT 21 2016 I ARRIVED AT MY HOME. I DROVE UP MY GRAVEL  
28 DRIVEWAY IN D(DRIVE) AND SLOWED TO A STOP AND MY TRUCK

1 BEGAN TO ROLL BACKWARD UNDER MY CONTROL. I WAS CHECKING  
2 ON THE GROUND FOR LAWN DAMAGE. THE TRUCK SHUTTERED TWICE,  
3 SHUT OFF AND STARTED TO ROLL BACKWARD TOWARD A TREE. I  
4 QUICKLY REGAINED CONTROL WITH A PANIC STOP. I WAS ABLE TO  
PLACE THE TRUCK IN PARK AND RESTART THE TRUCK. I HAD LOST  
CONTROL OF THE TRUCK.

5 86. Another incident involving a Chevrolet Silverado was reported on November 9, 2016:

6 TRANSMISSION IS LURCHING IF DRIVING 50 MPH THEN SLOW DOWN TO  
7 35 MPH WHEN YOU GO TO SPEED BACK UP IT LURCHES. COMPLAINED  
8 TO CHEVROLET SEVERAL TIMES THEY SAY CANNOT FIND ANYTHING  
WRONG.

9 87. Another incident involving a Chevrolet Silverado was reported on December 12, 2016:

10 TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO 1500. WHILE  
11 DRIVING APPROXIMATELY 45 MPH, THE CHECK ENGINE INDICATOR  
12 ILLUMINATED. THE VEHICLE STARTED TO DECELERATE WHEN  
13 DEPRESSING THE ACCELERATOR PEDAL. THE VEHICLE WAS TAKEN TO  
14 THE DEALER, BUT WAS NOT DIAGNOSED OR REPAIRED. THE  
MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE  
APPROXIMATE FAILURE MILEAGE WAS 33,000.

15 88. Another incident involving a Chevrolet Silverado was reported on December 13, 2016:

16 TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO 1500. THE  
17 CONTACT STATED THAT WHILE DRIVING AT VARIOUS SPEEDS, THERE  
18 WAS A LOUD CLUNKING NOISE COMING FROM THE REAR OF THE  
19 VEHICLE. THE CONTACT STATED THAT THE FAILURE OCCURRED AFTER  
SHIFTING GEARS. THE VEHICLE WAS NOT REPAIRED. THE  
MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE  
MILEAGE WAS 17,000.

20 89. On May 11, 2016, the following incident was reported:

21 I BOUGHT A 2016 CHEVY SILVERADO 1500 LTZ Z71 AND IT VIBRATES AT  
22 IDLE AND THE TRANSMISSION IS SLIPPING. I HAD ALREADY TOOK IT TO  
23 THE DEALERSHIP TO GET IT FIX, BUT NO LUCK. GM TOLD ME THAT IS  
24 HOW THE TRUCK IS DESIGNED TO OPERATE, WHICH IS HARD TO  
25 BELIEVE. THERE IS ABSOLUTELY ZERO HELP FROM GM TO HELP ME  
26 RESOLVE THE PROBLEM. I WAS GIVEN AN OPTION TO TRADE IT IN FOR  
27 A NEW ONE AT MY OWN EXPENSES OR DEAL WITH THE PROBLEM. FORD  
WOULD NOT TAKE MY TRUCK AS A TRADE IN NOR WILL GMC. THIS  
VEHICLE CAN POTENTIALLY BY DANGEROUS AND A LIABILITY AS THE  
TRANSMISSION SEEM TO HAVE A MIND OF ITS OWN AND THE  
CONSTANT VIBRATION CANNOT POSSIBLY HE GOOD FOR ANYONE.

28 90. Another incident involving a Chevrolet Silverado was reported on October 3, 2016:

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THE ISSUE(S) THAT I AM EXPERIENCING ALL APPEAR TO BE WITH THE TRUCKS 8 SPEED TRANSMISSION. THE FIRST TWO OCCUR DURING BREAKING AND THE THIRD HAPPENS WHEN ACCELERATING FROM A "COLD" START. A DESCRIPTION OF EACH OF THE THREE MAJOR ISSUES ARE OUTLINED BELOW:

1. DURING INITIAL BREAKING THE TRUCK WILL BEGIN TO SLOW DOWN AS INTENDED AND WITHOUT WARNING IT ABRUPTLY ACCELERATES/SLIDES FORWARD (SEE BREAKING PROFILES). THIS TYPICALLY HAPPENS BETWEEN 10-20 MPH.

2. DURING BREAKING JUST BEFORE COMING TO A STOP I EXPERIENCE A HARD JERK OR SHUDDER (SEE BREAKING PROFILES).

3. DURING A "COLD" START, IN THE MORNING OR AFTER WORK, THE TRANSMISSION WILL SOMETIMES SLIP AND SHIFT HARD WHILE PULLING OUT OF MY DRIVEWAY/PARKING LOT.

THE ISSUES ARE ALL INTERMITTENT.

91. Another incident involving a Chevrolet Silverado was reported on October 16, 2016:

I HAD TWO EPISODES OF SUDDEN UNINTENDED ACCELERATION WHILE DRIVING HIGHWAY SPEEDS ON A HIGHWAY. TRUCK IS WEEKS OLD-1500MILES ONLY. BRAKES STILL WORKED SO I WAS ABLE TO STOP. RPMS CONTINUED TO ESCALATE IN NEUTRAL AND PARK. HAD TO TURN OFF ENGINE QUICKLY TO ABORT THE PROBLEM. I'M TAKING THE TRUCK IN FOR EVALUATION TOMORROW. MY WIFE AND TWO OLDEST SONS WERE IN THE VEHICLE. \*TR

92. Another incident involving a Chevrolet Silverado was reported on November 15, 2016:

TL\* THE CONTACT OWNS A 2016 CHEVROLET SILVERADO 1500. WHILE ATTEMPTING TO ACCELERATE FROM A STOP, THE VEHICLE FAILED TO ACCELERATE. THE CONTACT COASTED INTO A PARKING LOT AND NOTICED THAT THE FRONT PASSENGER SIDE AXLE INDEPENDENTLY SHIFTED TO THE REAR OF THE CHASSIS, WHICH POTENTIALLY CAUSED A SPARK TO THE TIRES. THE VEHICLE WAS TAKEN TO THE DEALER, BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 4,000.

93. On July 20, 2018, the following incident was reported:

8 SPEED TRANSMISSION CLUNKS WHEN SHIFTING INTO 2 GEAR AND AT TIMES FEELS LIKE YOU GOT REAR ENDED. WHEN IT DOWN SHIFTS INTO THE LOWER GEARS ITS ALSO CLUNKS AND IS NOT SMOOTH. THIS IS HAPPENING WHEN GOING AT SLOW SPEEDS AND IS WORSE AFTER A

1 COLD START. THE VEHICLE SHIFTS FINE AT HWY SPEEDS. I HAVE  
2 ALREADY BROUGHT IT TO THE DEALERSHIP TWICE AND PROBLEM IS  
3 STILL THERE. TALKING TO OTHER PEOPLE WITH GM 8 SPEED  
4 TRANSMISSION AND THEY ARE HAVING THE SAME ISSUE. 8 SPEED  
5 TRANSMISSION NEEDS RECALL.POSSIBLY TORQUE CONVERTER.

6 94. Another incident involving a 2017 Chevrolet Silverado was reported on July 18, 2018:

7 ENGINE HESITATION, OR MISFIRING. JERKING, OR TRANSMISSION  
8 SHUTTERING WHEN ENGINE IS AT LOW RPM AND ON INCLINE. (I.E.  
9 WHEN TRAVELING ABOUT 45MPH AND START UP A HILL, THE RPM'S  
10 ARE ABOUT 1300 AND THE TRANSMISSION DOESN'T GEAR DOWN, SO IT  
11 STARTS SHUTTERING UNTIL YOU GIVE IT MORE ACCELERATION THAN  
12 USUAL.) AFTER DEALING WITH THIS ISSUE FOR NEARLY 8 MONTHS AND  
13 15K MILES, I BELIEVE THIS SAFETY ISSUE SHOULD BE RECALLED.  
14 DEALER ORIGINALLY ACKNOWLEDGE THE PROBLEM BUT WAS UNSURE  
15 OF THE CAUSE. AFTER 5 REPAIR ATTEMPTS THE DEALER SAY THEY  
16 CAN'T DUPLICATE AND THE VEHICLE PERFORMS AS DESIGNED.

17 95. Another incident involving a Chevrolet Silverado was reported on May 9, 2018:

18 TRANSMISSION ABRUPTLY SHIFTING. FEEL LIKE THE TRUCK IS BEING  
19 HIT BY ANOTHER VEHICLE. I DON'T KNOW WHEN IT'S GONNA DO IT BUT  
20 WHEN IT DOES, ITS SCARY. THE OTHER DAY WHILE TRYING TO BACK UP  
21 INTO MY DRIVE WAY, THE WOULD NOT MOVE WHEN I PUSHED ON THE  
22 PEDAL. THEN ON IT'S OWN, THE TRUCK BURNED RUBBER BACKWARDS  
23 WHEN I TOOK MY FOOT OFF OF THE GAS PEDAL. I ALMOST DROVE INTO  
24 MY GARAGE! THIS TRUCK IS NOT SAFE AND NEEDS TO BE REMOVED  
25 FROM SERVICE! THIS IS AN ONGOING PROBLEM THAT YOU NEVER  
26 KNOW WHEN IT'S GOING TO HAPPEN DURING YOU DRIVE.

27 96. Another incident involving a Chevrolet Silverado was reported on March 27, 2018:

28 VEHICLE HESITATION AND SURGES IN ACCELERATION. THIS  
CONDITION IS A SAFETY ISSUE AS IT HESISTATES PULLING INTO  
TRAFFIC, SURGES IN ACCELERATION HAVE CAUSED LOSS OF TIRE  
TRACTION ON ICE COVERED ROADWAYS NEARLY RESULTING IN A  
COLLISION. DEALERS HAVE ACKNOWLEDGED AN ISSUE BUT ADVISE  
THEY ARE STILL WAITING ON A FIX FROM GM.

97. Another incident involving a Chevrolet Silverado was reported on March 22, 2018:

PURCHASED MY 17 CHEVROLET SILVERADO 1500 ON 11/28/17 AND  
RETURNED IT TO THE DEALERSHIP ON 12/1/17. THIS WAS DUE TO A  
SEVERE SHUDDERING & SHIFTING IN THE TRANSMISSION & SEVERE  
SHAKE IN THE FRONT END AT 70-90MPH. THEY BALANCED & ROTATED  
THE TIRES, SAYING THE ISSUE WAS FIXED, I PICKED THE VEHICLE BACK  
UP ON 12/4/17 BUT THE ISSUE WAS NOT FIXED & AN ELECTRICAL ISSUE  
HAD ALSO OCCURRED. I TOOK THE VEHICLE BACK ON 12/7/18 WITH THE

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SAME COMPLAINTS REGARDING THE TRANSMISSION & SHAKING IN THE FRONT END, AS WELL AS THE ELECTRICAL ISSUE. THE DEALERSHIP CALLED ME ON 12/8/17, TOLD ME THEY HAD BEEN UNABLE TO DUPLICATE THE ISSUES, FINDING NOTHING WRONG. I LEFT IT OVER THE WEEKEND, WENT IN MONDAY MORNING & SPOKE TO THE SERVICE MANAGER DIRECTLY. HE TOLD ME HE HAD PURCHASED THE SAME VEHICLE WITH THE SAME TRANSMISSION ISSUES. SAID THERE WAS A POSSIBLE FIX BY EXCHANGING THE TRANSMISSION FLUID & THEY WOULD USE A NEW MACHINE PICO TO CHECK IT OUT. THEY HAD TO REPLACE THE TORQUE CONVERTER DUE TO MALFUNCTIONING & PERFORM A PROGRAMMING MODULE UPDATE ON RADIO, I PICKED IT UP ON 12/22/17, ISSUE WITH THE TRANSMISSION WAS STILL NOT RESOLVED. I TOOK IT TO A DIFFERENT DEALERSHIP FOR TRANSMISSION SHUDDER, SHIFT & SHAKE ISSUE MOST NOTICEABLE AT 70-90MPH, & RADIO ISSUE. THEY WERE ADVISED TO PERFORM A MODULE UPDATE ON THE TRANSMISSION & GIVEN 2 OPTIONS ON THE RADIO, THEY CHOSE TO REPLACE THE SCREEN. I TOOK IT BACK TO THAT SAME DEALERSHIP, MODULE UPDATE MADE TRANSMISSION/FRONT END ISSUE WORSE, ESPECIALLY COMING OUT OF A CURVE. THEY'VE REPLACED MY 2 BACK TIRES SAID THEY WERE BAD & SHOULD FIX THE SHAKING ISSUE IN THE FRONT END. UNABLE TO DUPLICATE TRANSMISSION ISSUES THUS THEY CANNOT REPAIR IT. OWNERS WITH THE SAME ISSUES ARE BEING TOLD GM KNOWS BUT CAN'T FIX TRANSMISSION ISSUE.

98. Another incident involving a Chevrolet Silverado was reported on February 26, 2018:

8 SPEED TRANSMISSION SHIFT VERY ROUGH FROM 1-2 AND 2-1 GEARS, FREQUENTLY HESITATES, MAKES CLUNKING SOUND. HAVE TAKEN IT TO GM DEALER AND AM INFORMED THAT YES, THAT'S THE WAY THE 8 SPEEDS ARE. THIS IS A \$50K+ TRUCK. THIS TRANSMISSION ISSUE CAUSES AND CAN CAUSE HESITATION WHEN NEEDING TO ACCELERATE, THUS CREATING A SAFETY HAZARD.

99. Another incident involving a 2017 Chevrolet Silverado was reported on February 13, 2018:

TRANSMISSION SHIFTS HARD AND VEHICLE SURGES AT LOW SPEED WITH ACCOMPANING "CLUNK". PROBLEM OCCURS IN BOTH UPSHIFT AND DOWN SHIFT. DEALER INFORMS ME THAT IS A "LEARNING" CURVE FOR VEHICLE TO UNDERSTAND MY DRIVING HABITS. HOWEVER I SEE ON SEVERAL AUTOMOTIVE FORUMS THAT THIS HAS BEEN AN ISSUE FOR SOME TIME AND HAS YET TO BE RESOLVED.

100. Another incident involving a Chevrolet Silverado was reported on February 1, 2018:

THE CONTACT OWNS A 2017 CHEVROLET SILVERADO 1500. WHILE DRIVING 25 MPH, THE VEHICLE SHIFTED HARD FROM FIRST TO SECOND

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GEAR. THE FAILURE OCCURRED EVERYDAY SINCE THE VEHICLE WAS PURCHASED IN APRIL OF 2017. THE VEHICLE WAS TAKEN TO O'REILLY CHEVROLET (6160 E BROADWAY BLVD, TUCSON, AZ 85711) WHERE IT WAS DIAGNOSED THAT THE TRANSMISSION CONTROL MODULE FAILED. THE DEALER REPROGRAMMED THE TRANSMISSION, WHICH FAILED TO REMEDY THE FAILURE. THE VEHICLE WAS BROUGHT BACK TO THE DEALER AND THE VALVE BODY FOR THE TRANSMISSION WAS REPLACED AND THE TRANSMISSION FLUID WAS CHANGED. THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURES. THE FAILURE MILEAGE WAS 16,000.

101. Another incident involving a 2017 Chevrolet Silverado was reported on January 6,

2018:

NOTICED AFTER PURCHASE THAT THERE IS VIBRATION LIKE A BAD TIRE 35-42 MPH.

VIBRATION FELT IN SEAT, CONSOLE AND STEERING WHEEL 58-65 MPH. TRANSMISSION DOWN SHIFTS HARD SOMETIMES FEELS LIKE BEING BUMPED FROM BEHIND, IT ALSO HESITATES AND JERKS AFTER LETTING OFF THE ACCELERATOR AND ACCELERATING AGAIN BETWEEN 25-45 MPH.

WHEN ACCELERATING IT SURGES, JERKS AND STUMBLES. SOMETIMES WHEN ACCELERATING THE TRANSMISSION DOWNSHIFTS AND HANGS IN THAT GEAR UNTIL YOU LET OFF THE ACCELERATOR.

UNDER HEAVY ACCELERATION THERE IS VIBRATION IN THE POWER TRAIN AND THE TRANSMISSION SEEM NOISY. AT 25 MPH IT SHUTTERS LIKE THE TRANSMISSION IS IN TO HIGH OF A GEAR UNDER LIGHT ACCELERATION.

RETURNED TO WALDORF CHEVROLET WHERE I PURCHASED IT AND WAS TOLD THEY BALANCED 2 TIRES AND RESET THE ROAD FORCE. SCANNED TRANSMISSION NO CODES TRANSMISSION OK AFTER SHOP FOREMAN ROAD TESTED FOR 21 MILES NO OTHER REPAIRS NEEDED.

PICKED IT UP DRIVING HOME NOTICED ALL THE PROBLEMS WERE STILL THERE AND AFTER INSPECTION OF MY TRANSMISSIONS NOTICED THAT THE TRANSMISSIONS WERE BALANCED STILL HAD THE OLD WEIGHTS STILL ON THE TRANSMISSIONS WITH NEW WEIGHTS ALSO.

MADE ANOTHER APPOINTMENT THIS TIME TO HAVE SHOP FOREMAN (RICK) RIDE WITH ME TO SHOW HIM WHAT IT WAS DOING WHICH WE DID AND LEFT MY TRUCK AGAIN.

AFTER 8 DAYS I AM TOLD IT WAS READY I WAS TOLD THEY DID A PICO SCOPE TEST AND THE DRIVESHAFT WAS BEING REPLACED THEN ONLY

1 TESTED IT WAS OK. CHECKED RUN OUT ON FLANGES ALL WITHIN  
2 SPECS. FOUND THE RIGHT REAR TIRE BAD. THEY PUT STEEL WHEEL  
3 FROM ANOTHER TRUCK ON AND ROAD TESTED WITH NO CHANGE. THEY  
4 DROVE ANOTHER TRUCK AND IT RIDES THE SAME. EVEN HAS THE  
SHUTTERS ON HARD ACCELERATION. SAID THEY CALLED GM TAC  
BACK AND THEY DONT SEE A PROBLEM WITH THIS.

5 WRITTEN DOCUMENTS BE SENT VIA MAIL.

6 MADE ANOTHER APPOINTMENT

7 102. Another incident involving a Chevrolet Silverado was reported on October 27, 2017:

8 TRANSMISSION ON MY NEW 2016 Z71 LT 4X4 JUMPS INTO LOW GEAR  
9 WHEN SLOWING DOWN. I TOOK IT TO THE DEALERSHIP MULTIPLE  
10 TIMES, BUT KEEP GETTING TOLD IT SHIFTS FINE. TOOK IT AGAIN AND  
11 HAD A MANAGER DRIVE THE TRUCK WITH ME INSIDE AND AGREED THE  
12 TRANSMISSION WAS NOT GETTIN INTO GEAR IN A NORMAL WAY. TOON  
IT BACK TO GET IT FIXED AND WAS TOLD TRANSMISSION IS FINE. I NEED  
THIS FIXED OR I WILL BE RETURNING HE TRUCK AS A LEMON TITLE.

13 103. Another incident involving a Chevrolet Silverado was reported on April 5, 2017:

14 THE CONTACT OWNS A 2017 CHEVROLET SILVERADO 1500. WHILE  
15 DRIVING 45 MPH, THE TRANSMISSION FAILED TO SHIFT PROPERLY AND  
16 MADE A CLUNKING SOUND. THE FAILURE RECURRED MULTIPLE TIMES.  
17 THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED  
18 THAT THE TRANSMISSION FAILED AND NEEDED TO BE  
REPROGRAMMED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE  
RECURRED. THE MANUFACTURER WAS MADE AWARE OF THE ISSUE.  
THE APPROXIMATE FAILURE MILEAGE WAS 30.

19 104. On October 4, 2019, the following was reported as to a 2018 Chevrolet Silverado:

20 SEVERAL TIMES, WHILE DRIVING RIGHT AROUND 55 MPH, THE  
21 TRANSMISSION DOWNSHIFTED FOR NO REASON ON THRUWAY  
22 CONDITIONS. WHEN THIS HAPPENED, IT WAS ALMOST LIKE SLAMMING  
23 ON THE BRAKES QUICKLY. ON ALL OCCASIONS, MY BODY LURCHED  
24 FORWARD. IF SOMEONE WAS BEHIND ME, I PROBABLY WOULD HAVE  
25 BEEN REAR ENDED. ON ANOTHER OCCASION, WITH MY SON IN THE  
26 TRUCK, WE STOPPED AT A RED LIGHT AND THE TRANSMISSION  
27 CLUNKED SO VIOLENTLY, THAT WE BOTH THOUGHT WE WERE REAR  
28 ENDED AT FIRST. I DESCRIBED THE ISSUE TO MY GM SERVICE SHOP  
WHO SAID THAT THEY COULDN'T FIND AN ISSUE AND THAT THE CODES  
WERE ALL NORMAL. I WAS ADVISED THAT THE CLUNK AT THE RED  
LIGHT WAS COMMON, AS THE TRANSMISSION HAS TO RELIEVE  
PRESSURE. NO WAY IS THIS NORMAL! I GOT ON LINE TO REVIEW  
FORUMS AND IT APPEARS THIS IS A VERY PREVALENT ISSUE.  
YESTERDAY, I LOST MY TRANSMISSION COMPLETELY ON A THRUWAY.

1 I HEARD A LOUD CLUNK AND THE RPMS SPIKED. I LEFT THE HIGHWAY  
2 ASAP BUT COULD NOT GO OVER 30 MPH OR THE RPMS WOULD JUST  
3 SPIKE WITHOUT MOTION RESPONSE. EXITING THE THRUWAY AT THIS  
4 SPEED WAS VERY DANGEROUS! EVEN WITH HAZARDS ON, DRIVERS  
5 SELDOM SLOW DOWN OR MOVE OVER, ESPECIALLY 18 WHEELERS.  
6 THESE TRANSMISSIONS ARE CLEARLY A SAFETY HAZARD.

5 105. On November 28, 2018, the following was reported:

6 THE EIGHT SPEED AUTOMATIC TRANSMISSION STUTTERS AND ACTS  
7 LIKE IT DOESN'T KNOW WHAT GEAR TO GO INTO UNDER LIGHT TO  
8 NORMAL ACCELERATION. THIS OCCURS WHILE COLD AND DURING THE  
9 WARMING PERIOD, (NORMALLY UP TO AROUND 180 DEGREES), BUT  
10 TENDS TO RESOLVE AFTER THE ENGINE IS COMPLETELY WARMED UP.  
11 THIS TRANSMISSION PROBLEM IS CONTINUOUS AND HAPPENS EVERY  
12 TIME AFTER THE VEHICLE SITS ALL NIGHT OR IF IT HAS SIMPLY SIT FOR  
13 A FEW HOURS. IT IS VERY APPARENT, OTHER PASSENGERS ASK WHAT  
14 IS WRONG WITH THE VEHICLE WHEN THEY RIDE IN IT. I BOUGHT THE  
15 VEHICLE NEW, BUT WHEN I TOOK THE TEST DRIVE IT WAS ALREADY  
16 WARMED UP. THEREFORE I WAS UNAWARE OF THE ISSUES PRESENT. I  
17 WENT BACK TO THE SALESMAN TO DESCRIBE THE PROBLEM AND WAS  
18 INFORMED THIS HAPPENS WITH ALL THE 2018 EIGHT SPEED  
19 SILVERADO'S HE HAS DRIVEN ON THEIR LOT. I LOOKED ON THE  
20 INTERNET AND FOUND THESE TRANSMISSIONS HAVE A LEARN CYCLE,  
21 SO I DECIDED TO GIVE IT SOME TIME TO SEE IF WAS A LEARNING CURVE  
22 WITH THE COMPUTER. IT NEVER CLEARED UP. I LATER BROUGHT THE  
23 VEHICLE INTO THE DEALERSHIP FOR THE INITIAL SERVICE AND  
24 DESCRIBED WHAT HAD BEEN HAPPENING WITH IT TO THE SERVICE  
25 DEPARTMENT. I LEFT THE VEHICLE OVERNIGHT SO THE TECHNICIAN  
26 COULD DRIVE FIRST THING IN THE MORNING AND PERFORM AN  
27 SERVICES. THE NEXT DAY I WAS CALLED AND TOLD MY VEHICLE WAS  
28 READY. UPON ARRIVAL I WAS INFORMED THE TECHNICIAN WAS ABLE  
TO DUPLICATE THE PROBLEMS I DESCRIBED, BUT IT WAS NORMAL FOR  
THE EIGHT SPEED TRANSMISSION. HOWEVER, IT BECOMES WORSE TO  
BRING IT BACK IN FOR FURTHER DIAGNOSIS. I CALLED GM, THEY ALSO  
LOOKED INTO THE CASE FOR ABOUT A WEEK, THEN CALLED BACK AND  
STATED THAT IS NORMAL FOR THE TRANSMISSION. I BOUGHT THE  
VEHICLE NEW WITH ABOUT 2,500 MILES ON IT, (DEMO), AND HAVE HAD  
IT ONLY A FEW MONTHS. IT CURRENTLY HAS LESS THAN 10,000 MILES  
ON IT.

24 106. On April 3, 2019, the following was reported, noting it could be a "serious safety  
25 issue":

26 THE TRANSMISSION SLIPS OR SHUDDER, ALSO HAS FREE WHEELED  
27 WHEN GOING DOWN HILL AT SLOW SPEEDS, ALSO OCCURS IN REVERSE,  
28 USUALLY ABOUT 1 TO 2 CAR LENGTHS. HAVE RETURNED TO THE  
DEALER SEVERAL TIMES AND BEEN TOLD THAT GM DOES NOT HAVE A

1 REMEDY. HAD THE SERVICE RECOMMENDATION OF A TRANSMISSION  
2 FLUED FLUSH DONE TWICE WITH DIFFERENT FLUID INSTALLED WITH  
3 NO CHANGE. HAS BEEN IN THE DEALERS SHOP FOR 3 WEEKS WITH GM  
4 LOOKING AT THE PROBLEM, NO SOLUTION IN SIGHT. NO CONFIDENCE  
5 THAT GM CAN FIX THE PROBLEM. THIS COULD DEVELOP INTO A  
6 SERIOUS SAFETY ISSUE.

5 107. On July 19, 2019, the following was reported as to a 2019 Chevrolet Silverado:

6 8L90 AUTOMATIC TRANSMISSION WILL LURCH FORWARD ABRUPTLY  
7 WHEN SHIFTING FROM 1-2 GEAR. ALSO, HARD SHIFT FROM 1-2 WHEN  
8 COLD.

8 108. On September 30, 2019, the following was reported:

9 TL\* THE CONTACT OWNS A 2019 CHEVROLET SILVERADO 1500. WHEN  
10 THE GEAR WAS SHIFTED INTO REVERS AND THEN SHIFTED BACK INTO  
11 DRIVE, THE BEHICLE JERKED AND LUNGED FORWARD. ON ONE  
12 OCCASIONI, THE CONTACT NEARLY STRUCK A PEDESTRIAN. THE  
13 VEHICLE WAS TAKEN TO AN UNKNOWN DEALER FOR DIAGNOSTIC  
14 TESTING. THE DEALER TEST DROVE VEHICLE AND WAS ABLE TO  
15 RECREATE THE FAILURE; HOWEVER, THE DEALER WAS UNABLE TO  
16 RECEIVE A FAILURE CODE. THE CONTACT ALSO STATED THAT THE  
17 DEALER TEST DROVE ANOTHER 2019 CHEVROLET SILVERADO 1500 AND  
18 WAS ABLE TO RECREATE THE SHIFT FAILURE. THE MANUFACTURER  
19 WAS CONTACTED AND PROVIDED CASE NUMBER: 9-548-7097056. THE  
20 VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 1,200.

17 109. On October 31, 2019, the following was reported:

18 TV THE CONTACT OWNS A 2019 CHEVROLET SILVERADO 1500. WHILE  
19 DRIVING, THE VEHICLE WOULD SHIFT EXTREMELY HARD FROM FIRST  
20 INTO SECOND GEAR AND LUNGED FORWARD. THERE WERE NO  
21 WARNING INDICATORS ILLUMINATED. THE CONTACT CALLED UFTRING  
22 CHEVROLET (1860 WASHINGTON RD, WASHINGTON, IL 61571, (309) 444-  
23 3151) AND WAS INFORMED THAT THE FAILURE WAS A KNOWN ISSUE BY  
24 THE MANUFACTURER. THE VEHICLE WAS NOT TAKEN TO A DEALER OR  
25 INDEPENDENT MECHANIC FOR DIAGNOSTIC TESTING. THE VEHICLE  
26 WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE  
27 FAILURE AND DID NOT ASSIST. THE FAILURE MILEAGE WAS  
28 APPROXIMATELY 10,000.

25 110. On November 13, 2019, the following was reported:

26 TL• THE CONTACT OWNS A 2019 CHEVROLET SILVERADO 1500. WHILE  
27 DRIVING 70 MPH, THE VEHICLE DOWNSHIFTED TO 20 MPH.  
28 OCCASIONALLY, THE VEHICLE WOULD STOP MOVING AND SHUT OFF.  
ADDITIONALLY, THE VEHICLE FAILED TO SHUT OFF AT TIMES.  
FURTHERMORE, THE CHECK ENGINE, ENGINE REDUCED POWER LOW

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FUEL, SERVICE TRAILER BRAKE SYSTEM, SERVICE 4WD, SHIFT TO PARK, SERVICE ABS, REDUCED STEERING ASSIST, BACK UP CAMERA. SERVICE ESC, AND REDUCE TRANSMISSION FUNCTION WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO DELLENBACH MOTORS (3111 S COLLEGE AVE, FORT COLLINS, CO 80525, (970) 226-2438) WHERE IT WAS DIAGNOSED THAT THE TRANSMISSION CONNECTION FAILED. THE VEHICLE WAS REPAIRED; HOWEVER THE FAILURE RECURRED. THE MANUFACTURER WAS CONTACTED AND PROVIDED CASE NUMBER: 9-5621232945, BUT DID NOT ASSIST THE FAILURE MILEAGE WAS 1,800. THE VIN WAS INVALID.

111. On December 5, 2019, the following was reported:

WAS DRIVING BACK HOME GOING AROUND 65MPH WHEN ALL OF THE SUDDEN IT DOWN SHIFTED AND EVENTUALLY LOSE POWER. I PULLED OVER RESTARTED TRUCK AND CHECK ENGINE LIGHT TURNED ON AND WOULD NOT SHIFT OUT OF FIRST GEAR. I COULD NOT TAKE IT TO THE DEALERSHIP THAT DAY AS IT WAS SUNDAY AND WOULD HAVE TO WAIT TILL MONDAY. MONDAY 10/14/19 CAME AND I TOOK IT TO THE DEALERSHIP. DEALERSHIP HAS STILL NOT FIXED THE PROBLEM, THEY HAVE ALREADY REPLACED THE PC MODULE, AND VALVE BODY. NOW THEY ARE THEY SAYING THEY ARE GOING TO REPLACE THE WIRING HARNESS ON IT. I DO HAVE A GM CASE 49-564919828, HOWEVER THEY ARE NC HELP AND BASICALLY TELL ME THE SAME THING AS THE DEALERSHIP DOES. TRUCK HAS BEEN AT THE DEALERSHIP SINCE 10/14/19 AND HAVE STILL NOT FIXED IT, TODAY'S DAY 12/05/19.

112. On December 12, 2019, the following was reported:

ONGOING COMMUNICATION BETWEEN LOCAL DEALER AND CHEW/GM EXECUTIVE SUPPORT TEAM TO FIX SHUDDER/VIBRATION IS NOT RESOLVED. CHEW STATES 'NORMAL CHARACTERISTIC FOR THIS MODEL VEHICLE, 2019 SILVERADO 5.3, 8 SPEED. I VEHEMENTLY DISAGREE. GM APPROVED TORQUE CONVERTS SWAP AND THEN PROBLEM GOT MUCH WORSE. THEY NOW SAY, RESOLUTION IS FINAL, THIS IN NORMAL! PLEADED WITH DEALERSHIP GENERAL MGR, TO CONTACT DISTRICT SUPERVISORS TO RE-EVALUATE. NOW THEY ARE GOING TO RUN PICO TEST AND COMPARATIVE ANALYSIS AGAINST 2 NEW TRUCK ON THEIR LOT MY TRUCK ONLY HAS 6K MILES AND SHOULD SHAKE AND VIBRATE, BUT IT DOES AND GETTING WORSE. HARMONIC DISTORTION WITHIN CAB GETTING WORSE. SEEMS THE MORE MILES I PUT ON IT, THE WORSE IT GETS. AFTER DRAIN AND FLUSH OF TRANSMISSION, PER TSB, NOW ALSO HAD DELAYED SHIFTING, AND HAVING TO BRAKE HARD WHEN DOWNSHIFTING BECAUSE IT WANTS TO LURCH FORWARD. FRUSTRATING AT BEST, BUT SAFETY AND RISK OF INJURY ARE MY IMMEDIATE CONCERN. NEED HELP!

113. On May 3, 2020, the following incident was reported as to a 2020 Chevrolet Silverado:

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IT CUT OFF AT A STOP AND AFTER I STOP WITH WITH MY FOOT ON THE BRAKES. I FELL BUMP IN THE REAR OF THE TRUCK, LIKE I BEEN REAR END AND THE REAR SHAKES. SOME THE THE AS WELL. IT CUT OF AFTER I STOP A FEW SECONDS AND START RIGHT BACK UP. IN DRIVE WAY IDLES ABOUT 15 OR LONGER, IT CUTS OFF. I HAVE TO RESTART IT. AND TAKING OFF IN HESITATION AND SOME TIMES MOVEMENT IN THE REAR AND UNDER THE TRUCK. BOTH STATIONARY AND IN MOTION.

114. On June 23, 2020, the following incident was reported as to a 2020 Chevrolet

Silverado:

I WAS STOPPED N THE DRIVE THRU AT IN-N-OUT WITH MY FOOT ON THE BRAKE AND THE ECO SYSTEM HAD TURNED OFF THE MOTOR. IT SPONTANEOUSLY TURNED BACK ON WITHOUT ME LIFTING MY FOOT OFF OF THE BRAKE AND THE TRANSMISSION ENGAGED AND THE TRUCK LAUNCHED FORWARD APPROXIMATELY 12-18 INCHES. THIS IS THE SECOND TIME THIS HAS HAPPENED TO ME. IT ALSO HAPPENED ONE NIGHT ABOUT 2 MONTHS AGO. THIS COULD HAVE BEEN VERY DANGEROUS, I COULD HAVE HIT SOMEONE OR THEIR CAR OR I COULD HAVE EVEN RECEIVED WHIPLASH MYSELF. \*TR

115. On August 27, 2020, the following was reported:

2020 SILVERADO 1500 CUSTOM CREW CAB 4.6L, V6. PURCHASED TRUCK ON AUGUST 10, 2020. TOOK IT TO DEALER ON AUGUST 17, 2020 BECAUSE OF JERKING FORWARD AT LOW SPEED (20-25 MPH) AND REAR BRAKES MAKING A DEEP RUBBING SOUND. OF COURSE, TECHNICIAN SAID THERE WERE NO PROBLEMS (BECAUSE HE COULD NOT DUPLICATE) THE JERKING MOTION. AFTER PICKING UP MY TRUCK, I NOTICED THAT THEY DID NOT EVEN ADDRESS THE BRAKE ISSUE, NOR DID THE SERVICE ADVISOR NOTE IT ON THE FORM.

116. On October 3, 2020, the following was reported:

I'M THE OWNER OF A NEWLY BOUGHT (6/5/2020 PURCHASED DATE) 2020 GMC CANYON. I TOOK MY TRUCK INTO THE DEALERSHIP AND COMPLAINED THAT I HAVE EXPERIENCED TRANSMISSION ISSUES WHEN DOWNSHIFTING OR ACCELERATING. MY MOST COMMON ISSUE IS 'SHUDDERING' WHEN THE TRUCK ACCELERATES AND SUDDEN 'JERKING' WHEN DOWNSHIFTING GEARS WHEN DRIVING UP AN INCLINE OR EVEN COMING TO A COMPLETE STOP. THE DEALERSHIP SAID THEY HAVEN'T HAD ANY PROBLEMS WITH THE 2020 CANYONS AND UNLESS IT READS A 'CODE' THERE'S NOTHING THEY CAN DO. GM SAID TELL THE CUSTOMER TO DRIVE IT AND WE WILL CALL IF WE GET ANY FURTHER INFORMATION. THIS IS A SERIOUS PROBLEM. I WAS DRIVING THE VEHICLE AND BECAUSE OF THE SUDDEN JERKING AND TRANSMISSION & OR ENGINE ISSUES WITH THE VEHICLE THE RPMS REVED UP TO OVER 4500 RPMS AND I WAS STUCK OUT IN THE MIDDLE

1 OF A LANE AND COULD NOT GO ANYWHERE. I HAD CARS AVOIDING ME  
 2 SO THAT WAY THEY WOULD NOT HIT ME HEAD ON OR ON THE SIDE OF  
 3 MY TRUCK. THIS IS A SERIOUS AND FATAL ACCIDENT WAITING TO  
 4 HAPPEN AND THE ISSUE IS GM KNOWS ABOUT IT BECAUSE IT HAPPENED  
 5 WITH THEIR 2015- 2019 COLORADO AND CANNON SERIES. DESPITE  
 6 MANY COMPLAINTS AND NUMEROUS LAWSUITS ABOUT THESE  
 7 SERIOUS ISSUES, THERE ARE CURRENTLY NO ONGOING  
 8 INVESTIGATIONS REGARDING TRANSMISSION AND ENGINE DEFECTS  
 9 FOR THESE VEHICLES WITHIN GM FOR THE 2020 CANON. I HAVE PAID  
 10 ALMOST \$50,000 FOR A VEHICLE THAT SHOULD HAVE A LEMON LAW  
 11 PUT ON IT BECAUSE GM KNOWS THEY ARE PRODUCING BAD  
 12 TRANSMISSION/ENGINES AND NOT DOING ANYTHING ABOUT IT. I  
 13 ASKED GM CORPORATE AND THE LOCAL DEALERSHIP WHAT AM I  
 14 SUPPOSED TO DO WHEN I'M IN ANOTHER SITUATION WHERE THE  
 15 VEHICLE DOES NOT WANT TO GET IN GEAR AND IS SHAKING AND  
 16 SHUTTERING AND JERKING AND REVVING UP THE RPMS AND THE NEXT  
 17 TIME. I SAID I PROBABLY WOULDN'T BE SO LUCKY AS TO HAVING  
 18 PEOPLE AVOID ME AND THEN ME AND MY DAUGHTER WIND UP IN A  
 19 HEAD ON COLLISION AND WE DON'T MAKE IT OUT ALIVE.

12 117. On June 4, 2021, the following incident was reported for a 2020 Chevrolet Silverado:

13 Transmission slipped then went limp at 35-40 mph. Truck would not accelerate at all.  
 14 Had towed back to dealership.

15 118. On June 9, 2021, the following incident was reported, noting "GM knows they have

16 an issue" based on the service manager's response:

17 Wife was headed to town when the truck started bucking and surging then leaving her  
 18 stranded along side the road. NO MIL on until 5 mins after the bucking and surging  
 19 started. called GM and basically said oh we will just fix it. Didn't care since we were  
 20 able to start it back up and drive it home and then have it towed to the retailer next  
 21 day. Truck has 6000 miles on the odometer. GM knows they have an issue as Service  
 22 manager explained tech tips they have on this truck.

22 119. In September 2021, a driver reported harsh shifting as "effect[ing] safety":

23 Upon first start with 6-8 hours of being parked, the first shift from gear 1 to gear 2 has  
 24 a massive hesitation that cause all passengers to lurch forward. It has not caused in  
 25 issues for the quiet street we live on but in a high traffic area it would effect safety of  
 26 entering into traffic. This issue happens every morning.

26 **b. Chevrolet Colorado**

27 120. On September 1, 2017, the following incident was reported as to a 2017 Chevrolet  
 28 Colorado:

1 AIR CONDITIONING IS INTERMITTENT/BLOWS WARM/EMITS FOG FROM  
2 VENTS. THE DEALER SAYS NO FIX AVAILABLE YET CITES PER DOC  
3 ID:5125499.SAYS ENGINEERING IS STUDYING PROBLEM. MINE STOPS  
4 WORKING-BLOWS WARM WITH IN 1/2 HOUR. ALSO IN STOP/GO TRAFFIC  
5 THE TRANSMISSION DOWNSHIFTS ABRUPTLY AND CAUSES TRUCK TO  
6 ACCELERATE FORWARD-HAVE TO APPLY BRAKES HARD TO AVOID  
7 COLLISION. DEALER SAYS CAN NOT REPEAT BUT SHIFTING IS  
8 CONSISTENTLY ABRUPT AND I HAVE ASKED ABOUT SOFTWARE  
9 UPDATES TO ALLIEVIATE THIS SAFTY CONCERN TO NO AVAIL

10 121. Another incident involving a Chevrolet Colorado was reported on September 13, 2017:

11 THE CONTACT OWNS A 2017 CHEVROLET COLORADO. WHILE DRIVING  
12 AT AN UNKNOWN SPEED, THE VEHICLE ACCELERATED AND JERKED.  
13 ADDITIONALLY, THE BRAKES WERE APPLIED, BUT FAILED TO RESPOND  
14 AND THE BRAKE PEDAL TRAVELED TO THE FLOORBOARD. IN ADDITION,  
15 THE CONTACT HEARD AN ABNORMAL SCRATCHING NOISE. THERE  
16 WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS  
17 TAKEN SEVERAL TIMES TO GILROY CHEVROLET (6720 AUTOMALL CT,  
18 GILROY, CA. 95020, 408-842-9301), BUT THEY WERE UNABLE TO  
19 DUPLICATE THE BRAKE FAILURE. THE DEALER DIAGNOSED THE  
20 ACCELERATION FAILURE AS THE FOUR WHEEL DRIVE BEING ENGAGED.  
21 THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED  
22 AND PROVIDED CASE NUMBER: 8-4000-730943. NO FURTHER ASSISTANCE  
23 WAS PROVIDED. THE FAILURE MILEAGE WAS APPROXIMATELY 17,759.

24 122. Another incident involving a Chevrolet Colorado was reported on November 1, 2017:

25 WHEN AUTOMATIC TRANSMISSION DOWNSHIFTS INTO 1ST GEAR  
26 COMING TO A STOP, IT LUNGES FORWARD. IF WHEN NOSING INTO A  
27 PARKING SPACE WITH ANY KIND OF POLE OR VEHICLE DIRECTLY IN  
28 FRONT OF MY TRUCK, NOT LEAVING ENOUGH SPACE MY TRUCK  
WOULD HIT WHATEVER. WHEN DRIVING SLOWLY WITH MY 8 SPEED  
AUTOMATIC TRANSMISSION SOMETIMES IT RATTLES AS IF I AM ON A  
RUMBLE STRIP AND SOMETIMES IT JUST CLUNKS OR THUDS. THIS AND  
OTHER SHIFT ISSUES MAKE ME EVEN MORE HYPER VIGILANT WHEN  
DRIVING. 6 MONTHS AFTER I PURCHASED MY BRAND NEW 2017  
COLORADO, DURING A SPELL OF NEGATIVE DEGREE WEATHER I LOST  
THE FOLLOWING: MY CRUISE CONTROL, TRACTION CONTROL, FOUR-  
WHEEL DRIVE; MY ENGINE LIGHT CAME, OIL LIGHT ALL LIGHTS CAME  
ON AND MY RADIO STOPPED WORKING. I WAS TOLD BY MY CHEVY  
DEALER THAT THIS WAS NORMAL IN COLD WEATHER. NEXT, I WAS  
INFORMED IT MUST BE BECAUSE I WASHED MY VEHICLE THE DAY  
BEFORE. THIS WENT ON FOR A FEW MONTHS, WITH ME SHOWING THEM  
VIDEOS AND THEM TELLING ME THEY COULD NOT DUPLICATE THE  
ISSUE. OCTOBER OF 2018 THEY REPLACED MY RADIO BECAUSE  
EVIDENTLY THE RADIO HAD A BULLETIN THAT SHOWED ALL OF THE  
THINGS I HAD COMPLAINED ABOUT. I WANT TO SAY THIS HAPPENED IN  
EXCESS OF 10 OR MORE TIMES. DRIVING TO MY MOTHERS ONE EVENING

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IN THE DARK MY DASH LIGHTS WERE NOT DIMMING CORRECTLY AND THEN WENT OUT. AS I GOT TO A FOUR WAY INTERSECTION WITH CARS COMING THEY CAME ON SO BRIGHTLY I ALMOST GOT IN AN ACCIDENT WHICH PROMPTED ME TO MAKE AN APPOINTMENT AND I WASN'T WILLING TO HEAR SILLY EXCUSES.

123. Another incident involving a Chevrolet Colorado was reported on April 9, 2018:

8 SPEED AUTOMATIC TRANSMISSION - ROUGH SHIFTING, USUALLY WHEN DRIVING BETWEEN 40 AND 60 MILES PER HOUR. TRUCK INTERMITTENTLY FEELS LIKE IT IS RIDING OVER RUMBLE STRIPS. TRANSMISSION SEEMS TO BE HUNTING. POSSIBLE ISSUE WITH TORQUE CONVERTER.

124. Another incident involving a Chevrolet Colorado was reported on April 30, 2018:

8-SPEED AUTOMATIC TRANSMISSION IN INDECISIVE WHEN IT COMES TO SHIFTING BETWEEN LOWER GEARS WHILE DRIVING. TRANSMISSION MAKING CLUNKING "THUD" SOUND WHEN SHIFTING OUT OF PARK AND INTO REVERSE. GEAR HUNTING EXPERIENCED AT LOWER SPEEDS AND GEARS WHILE VEHICLE ATTEMPTS SHIFTING.

125. Another incident involving a Chevrolet Colorado was reported on June 21, 2018:

8 SPEED TRANSMISSION HAS HARD SHIFT WHEN AT LOW SPEEDS AND WHEN GOING INTO REVERSE

126. Another incident involving a 2017 Chevrolet Colorado was reported on June 19, 2018:

WHEN DRIVING AT LOW SPEEDS MY 8 SPEED AUTO TRANSMISSION - CLUNKS OR THUDS - SPECIALLY FROM 1ST - 2ND - ITS SOUNDS LIKE A BANG - TOOK IT TO DEALER - SAID CHEVY KNOWS ABOUT IT - BUT THERE IS NO FIX YET.....GREAT!

127. Another incident involving a Chevrolet Colorado was reported on June 30, 2018:

WHEN AUTOMATIC TRANSMISSION DOWNSHIFTS INTO 1ST GEAR COMING TO A STOP, IT DOES SO HARSHLY AND LUNGES FORWARD. WHEN NOSING INTO A PARKING SPACE WITH A CONCRETE WALL AT THE FRONT OF THE PARKING SPACE, IF I HAD NOT ALLOWED ENOUGH SPACE FOR THE LUNGE, THE VEHICLE WOULD HAVE IMPACTED THE WALL. THIS CONDITION, ALONG WITH OTHER TRANSMISSION SHIFT IRREGULARITIES, HAPPENS PERIODICALLY AND I MUST REMAIN AWARE, ESPECIALLY COMING TO A STOP NEAR A CROSS WALK.

128. Another incident involving a Chevrolet Colorado was reported on July 7, 2018:

EXPERIENCING ELECTRICAL PROBLEMS CAUSING STARTING ISSUES, WHILE DRIVING FAILURES IN DASH INDICATOR LIGHS, SPEEDOMETER,

1 TACHOMETER, SHIFT CONTROL INDICATOR LIGHTS, AND  
2 TRANSMISSION CONTROL. LOSS OF POWER TO THE POINT TRUCK  
3 ALMOST COMES TO A STOP AND THEN SURGES, TWICE IT HAS  
4 ACCELERATED TRAVELING UP TO 50FT ESTIMATED.

5 129. On April 27, 2018, the following incident was reported as to a 2018 Chevrolet  
6 Colorado:

7 IN MAY 2018 I PURCHASED A NEW CHEVY SILVERADO LT Z71 PU. I LIVE  
8 IN COLORADO AND WHEN I DRIVE THE TRUCK DOWN THE I-70  
9 MOUNTAIN PASS THE TRANSMISSION IS DOWNSHIFTED BEYOND WHAT  
10 IO WOULD CALL A SAFE DOWN SHIFT. IM TRAVELING DOWN THE PASS,  
11 JUST COASTING, DOWN HILL ASSIST MODE IS OFF @ ROUGHLY 55 MPH  
12 THE TRANSMISSION DOWN SHIFT HARD. THE RPM GOES FROM ~1850 TO  
13 ~3800 RPM. THE ENGINE AND TRANSMISSION AND ENGINE BOTH MAKE  
14 A LOT OF NOISE WHEN THIS HAPPENS. I TRAVELED THE PASS ABOUT 8  
15 TIME NOW AND THE TRUCK DOES THIS FUNNY SHIFT EVERYTIME AND  
16 I HAVE PICTURE SHOWING 4 EVENTS. I'VE TAKING THE DRIVE INTO THE  
17 DEALER AND SINCE THE COMPUTER DOESN'T LOG A ERROR CODE THE  
18 DEALER DOESN'T KNOW WHAT TO DO. THIS PAST WEEK THEY GAVE  
19 ANOTHER 2018 P/U WITH THE SAME TRANNY AND ENGINE AND THAT  
20 TRUCK DID NOT DO THE SAME DOWNSHIFT. I BELIEVE THERE IS  
21 SOMETHING WRONG WITH MY TRUCK AND ALSO IF THIS EVENT  
22 HAPPENED IN THE WINTER ON A SNOWY ROAD THE TRUCK WOULD SPIN  
23 OUT OF CONTROL AND CAUSE A ACCIDENT AND IS A HUGE SAFETY  
24 CONCERN. I ALSO FILED A COMPLAINT WITH GM BUT THEY ARE  
25 REALLY NOT HELP TO RESOLVE THIS PROBLEM. THE DEALER LOOKED  
26 AT THE TRUCK AGAIN TODAY, NO CODES RECORDED, THE RESET THE  
27 TRANSMISSION MEMORY TODAY TO TRY AND SATISFY MY NEED TO DO  
28 SOMETHING. I NOW WAITING TO HEAR BACK FROM THE DEALER ON  
THE NEXT STEPS. I WILL ALSO CALL GM AGAIN TO GIVE THEM THIS  
INFORMATION. I AM ATTACHING PICTURE THAT CLEARLY SHOW THIS  
PROBLEM. I ALSO GIVEN THE DEALER THE SAME PICTURES.

129. Another incident involving a Chevrolet Colorado was reported on October 3, 2018:

SEVERAL TIMES, WHILE DRIVING RIGHT AROUND 55 MPH, THE  
TRANSMISSION DOWNSHIFTED FOR NO REASON ON THRUWAY  
CONDITIONS. WHEN THIS HAPPENED, IT WAS ALMOST LIKE SLAMMING  
ON THE BRAKES QUICKLY. ON ALL OCCASIONS, MY BODY LURCHED  
FORWARD. IF SOMEONE WAS BEHIND ME, I PROBABLY WOULD HAVE  
BEEN REAR ENDED. ON ANOTHER OCCASION, WITH MY SON IN THE  
TRUCK, WE STOPPED AT A RED LIGHT AND THE TRANSMISSION  
CLUNKED SO VIOLENTLY, THAT WE BOTH THOUGHT WE WERE REAR  
ENDED AT FIRST. I DESCRIBED THE ISSUE TO MY GM SERVICE SHOP  
WHO SAID THAT THEY COULDN'T FIND AN ISSUE AND THAT THE CODES  
WERE ALL NORMAL. I WAS ADVISED THAT THE CLUNK AT THE RED  
LIGHT WAS COMMON, AS THE TRANSMISSION HAS TO RELIEVE

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PRESSURE. NO WAY IS THIS NORMAL! I GOT ON LINE TO REVIEW FORUMS AND IT APPEARS THIS IS A VERY PREVALENT ISSUE. YESTERDAY, I LOST MY TRANSMISSION COMPLETELY ON A THRUWAY. I HEARD A LOUD CLUNK AND THE RPMS SPIKED. I LEFT THE HIGHWAY ASAP BUT COULD NOT GO OVER 30 MPH OR THE RPMS WOULD JUST SPIKE WITHOUT MOTION RESPONSE. EXITING THE THRUWAY AT THIS SPEED WAS VERY DANGEROUS! EVEN WITH HAZARDS ON, DRIVERS SELDOM SLOW DOWN OR MOVE OVER, ESPECIALLY 18 WHEELERS. THESE TRANSMISSIONS ARE CLEARLY A SAFETY HAZARD.

131. Another incident involving a Chevrolet Colorado was reported on November 2, 2018:

THE EIGHT SPEED AUTOMATIC TRANSMISSION STUTTERS AND ACTS LIKE IT DOESN'T KNOW WHAT GEAR TO GO INTO UNDER LIGHT TO NORMAL ACCELERATION. THIS OCCURS WHILE COLD AND DURING THE WARMING PERIOD, (NORMALLY UP TO AROUND 180 DEGREES), BUT TENDS TO RESOLVE AFTER THE ENGINE IS COMPLETELY WARMED UP. THIS TRANSMISSION PROBLEM IS CONTINUOUS AND HAPPENS EVERY TIME AFTER THE VEHICLE SITS ALL NIGHT OR IF IT HAS SIMPLY SIT FOR A FEW HOURS. IT IS VERY APPARENT, OTHER PASSENGERS ASK WHAT IS WRONG WITH THE VEHICLE WHEN THEY RIDE IN IT. I BOUGHT THE VEHICLE NEW, BUT WHEN I TOOK THE TEST DRIVE IT WAS ALREADY WARMED UP. THEREFORE I WAS UNAWARE OF THE ISSUES PRESENT. I WENT BACK TO THE SALESMAN TO DESCRIBE THE PROBLEM AND WAS INFORMED THIS HAPPENS WITH ALL THE 2018 EIGHT SPEED SILVERADO'S HE HAS DRIVEN ON THEIR LOT. I LOOKED ON THE INTERNET AND FOUND THESE TRANSMISSIONS HAVE A LEARN CYCLE, SO I DECIDED TO GIVE IT SOME TIME TO SEE IF WAS A LEARNING CURVE WITH THE COMPUTER. IT NEVER CLEARED UP. I LATER BROUGHT THE VEHICLE INTO THE DEALERSHIP FOR THE INITIAL SERVICE AND DESCRIBED WHAT HAD BEEN HAPPENING WITH IT TO THE SERVICE DEPARTMENT. I LEFT THE VEHICLE OVERNIGHT SO THE TECHNICIAN COULD DRIVE FIRST THING IN THE MORNING AND PERFORM AN SERVICES. THE NEXT DAY I WAS CALLED AND TOLD MY VEHICLE WAS READY. UPON ARRIVAL I WAS INFORMED THE TECHNICIAN WAS ABLE TO DUPLICATE THE PROBLEMS I DESCRIBED, BUT IT WAS NORMAL FOR THE EIGHT SPEED TRANSMISSION. HOWEVER, IT BECOMES WORSE TO BRING IT BACK IN FOR FURTHER DIAGNOSIS. I CALLED GM, THEY ALSO LOOKED INTO THE CASE FOR ABOUT A WEEK, THEN CALLED BACK AND STATED THAT IS NORMAL FOR THE TRANSMISSION. I BOUGHT THE VEHICLE NEW WITH ABOUT 2,500 MILES ON IT, (DEMO), AND HAVE HAD IT ONLY A FEW MONTHS. IT CURRENTLY HAS LESS THAN 10,000 MILES ON IT.

132. Another incident involving a 2018 Chevrolet Colorado was reported on November 16,

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I HAVE A 2018 CHEVROLET COLORADO LT 4WD CREW CAB. MULTIPLE TIMES ON A COLD START THE ENGINE IS MISFIRING. THE CHECK ENGINE LIKE COMES ON, THE VSA, AND T/C LIGHTS ALL COME ON AND A NOTIFICATION ON THE DASH SAYING STABILITRAK IS DISABLED. THE VEHICLE SHAKES TERRIBLY. THE CHECK ENGINE LIGHT WILL FLASH AND THEN GO SOLID. I AM AN AUTOMOTIVE TECHNICIAN. I KNOW THAT A MISFIRE SHOULD SET A HARD DTC. WHEN THE VEHICLE IS TURNED OFF AND STARTED SEVERAL HOURS LATER THERE IS NO CHECK ENGINE LIGHT OR ANY OTHER LIGHT ON. THE DEALERSHIP IN MARYSVILLE, OH HAD MY TRUCK FOR 3 DAYS AND TOLD ME THEY CLEANED A BUNCH OF TERMINALS AT SEVERAL CONNECTORS. WHATEVER THAT IS SUPPOSED TO DO. THEY SAID THEY STARTED THE VEHICLE SEVERAL TIMES AFTER AND EVERYTHING WAS GOOD. THE NEXT DAY AFTER I PICKED THE TRUCK UP, IT DID THE SAME EXACT THING! EXTREMELY FRUSTRATING! I KNOW A CONTINUOUS MISFIRE LET'S UNBURNED FUEL INTO THE CATALYTIC CONVERTER WHICH LEADS TO PREMATURE BREAKDOWN OF THE CATALYST. SO MY QUESTION IS WHAT IS BEING DONE ABOUT THESE ISSUES? ANOTHER ISSUE IS WITH THE TRANSMISSION. ON A COLD START THERE IS A CLUNK NOISE. THEN WHEN YOU ARE DRIVING AT CRUISING SPEED AND YOU LET OFF THE THROTTLE AND DEPRESS THROTTLE AGAIN THERE IS A SHUDDER. ALSO, WHEN YOU COME TO A COMPLETE STOP THE VEHICLE TRIES TO JOLT FORWARD. THIS IS EXTREMELY CONCERNING ESPECIALLY ON A VEHICLE WITH ROUGHLY 18,000 MILES ON IT. THIS NEEDS TO BE ADDRESSED PROMPTLY!!

133. On March 21, 2019, the following was reported as to a 2019 Chevrolet Colorado:

VEHICLE TRANSMISSION SEEMS TO LATE DOWN SHIFT WHEN SLOWING, CAUSING THE VEHICLE TO JUMP FORWARD ONCE SHIFTING HAS COMPLETED.

134. On June 12, 2019, the following was reported:

LATE DOWN SHIFT ... SHIFTS HARD... VEHICLE LURCHES FORWARD ON A STOP

135. On July 15, 2019, the following was reported:

I EXPERIENCE HARSH SHIFTS FROM 1.2 GEAR AND WHEN DOWNSHIFTING 2-1. IT JOLTS THE WHOLE TRUCK IT SOMETIMES RANDOMLY DOWNSHIFTS FOR NO REASON WHEN I DRIVING ON THE HIGHWAY I AM AFRAID THAT SOMETHING IS GOING TO FAIL IN THE DRIVETRAIN WHEN IM DRIVING.

136. On December 31, 2020, the following was reported as to a 2020 Chevrolet Colorado:

THE VEHICLE IS EXPERIENCING A SHAKE AND/OR SHUDDER DURING LIGHT THROTTLE ACCELERATION BETWEEN 25 AND 80 MPH STEADY

1 STATE DRIVING WHEN TRANSMISSION IS NOT ACTIVELY SHIFTING  
2 GEARS. THE CONDITION IS AS IF I WERE DRIVING OVER RUMBLE STRIPS.  
3 TSB 18-NA-355 ADDRESSES THIS ISSUE IN 2017 - 2019 CHEVY COLORADO  
4 PICKUP TRUCKS WITH THE 8 SPEED TRANSMISSION. THE 2020 MODEL  
5 SHOULD BE ADDED AS IT DOES NOT APPEARED TO BE FIXED AT THIS  
6 TIME. I PURCHASED THIS VEHICLE BRAND NEW FROM THE FACTORY  
7 WITH ONLY 5 MILES ON IT. THE SHUDDER ISSUE HAS BEEN PERSISTENT  
8 FROM THE VERY FIRST DAY I DROVE IT.

9 137. On August 12, 2021, the following “scary and unsafe situation” was reported as to a  
10 2021 Chevrolet Colorado:

11 I purchased a brand new Colorado earlier this year. The vehicle currently has about  
12 9,000 miles on the odometer. On two recent occasions within 1 1/2 weeks of each  
13 other while driving at highway speeds, there was a clunk noise and the transmission  
14 acted as if it had been shifted into neutral. The truck would not accelerate, and the  
15 RPMs were very high as I was pushing the accelerator and the vehicle was not  
16 responding but the engine was revving. This was an extremely scary and unsafe  
17 situation as cars were behind me and I narrowly avoided being hit as I tried to get over  
18 to the side of the road without any ability to accelerate. The first time it happened,  
19 after placing the vehicle in park and waiting a few minutes, I was able to get it back  
20 into gear and I drove straight to the dealer. The dealer “was unable to replicate the  
21 problem” and told me it was probably just a one-time “glitch.” Approximately 1 1/2  
22 weeks later, it happened again. I took it back to the dealer. The dealer stated that the  
23 computer showed error codes P0700 and P2817, both of which are faulty transmission  
24 codes. The dealer stated that the technician cleared the codes, drove the vehicle, and  
25 was once again “unable to replicate the problem.” The dealer stated that it was going  
26 to request assistance from Chevy’s engineers because it could not figure out what was  
27 wrong with the vehicle. I don’t believe the vehicle is safe to drive at this point, as I  
28 narrowly avoided being in an accident on two occasions within 1 1/2 weeks of each  
other due to the failure of the vehicle’s transmission to work appropriately.

**c. GMC Sierra**

138. On January 28, 2015, the following incident was reported as to a 2015 GMC Sierra:

1 I HAD MADE A COMPLAINT TO CHAPDELAINE BUICK- GMC THAT MY  
2 BRAND NEW TRUCK DID NOT SEEM TO GO INTO FOUR WHEEL DRIVE. I  
3 WAS TOLD TO BRING THE TRUCK TO THE DEALERSHIP AND THEY  
4 WOULD CHECK IT FOR ME. I WAS TOLD BY THE SERVICE DEPARTMENT  
5 THAT THE TRUCK WORKED JUST FINE IN FOUR WHEEL DRIVE. I THEN  
6 NOTICED THAT THE TRUCK SEEM TO SHIFT VERY ROUGH AND I CALLED  
7 THE SERVICE DEPARTMENT AND TOLD THEM THAT SOMETHING HAD  
8 TO BE WRONG. THE SERVICE DEPARTMENT ASKED ME TO BRING THE  
9 TRUCK BACK DOWN TO THEM THE NEXT DAY AND THEY WOULD TAKE  
10 IT FOR A TEST DRIVE. WHILE I WAS DRIVING THE TRUCK TO THE  
11 DEALERSHIP IT SHIFTED FROM DRIVE INTO NEUTRAL. I COASTED TO A  
12 STOP PUT THE VEHICLE INTO PARK SHUT OFF AND RESTARTED THE

1 ENGINE AND THEN SHIFTED BACK INTO DRIVE AND TRIED TO DRIVE  
2 AGAIN. THIS TIME THE VEHICLE SERVICE ENGINE LIGHT CAME ON AND  
3 THE VEHICLE STAYED IN LOW GEAR AND WOULD NOT SHIFT INTO A  
4 HIGHER GEAR. THE BEST SPEED I COULD MAKE WAS 10 MPH. I STOPPED  
5 THE VEHICLE AND RESTARTED TWO MORE TIMES. ON THE SECOND TRY  
6 THE VEHICLE DID GO INTO DRIVE. I MADE IT TO THE DEALERSHIP AND  
7 THEY TOOK IT FOR A TEST DRIVE AND UPON THEIR RETURN GAVE ME  
8 A LOANER VEHICLE. THEY HAD TO REBUILD THE TRANSMISSION ON MY  
9 BRAND NEW TRUCK WHICH TOOK ABOUT THREE DAYS. THANKFULLY  
10 THIS EVENT TOOK PLACE ON A BACK ROAD WITH LITTLE TRAFFIC. IF IT  
11 HAD HAPPENED ON A BUSY ROAD AN ACCIDENT MIGHT HAVE  
12 OCCURRED. \*TR

13 139. Another incident involving a GMC Sierra was reported on August 7, 2015:

14 THE CONTACT OWNS A 2015 GMC SIERRA. THE CONTACT STATED THAT  
15 WHILE DRIVING AT VARIOUS SPEEDS, THE TRANSMISSION VIBRATED  
16 CAUSING A HESITATION WHEN THE GEARS SHIFTED. THE CONTACT  
17 MENTIONED THAT THE FAILURE WAS MOST SEVERE WHILE DRIVING AT  
18 SPEEDS BETWEEN 40-50 MPH. THE VEHICLE WAS TAKEN TO A DEALER  
19 WHO CHANGED THE GEAR RATIO AND ADJUSTED THE REAR END. THE  
20 VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. THE  
21 MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE  
22 MILEAGE WAS 250.

23 140. Another incident involving a 2015 GMC Sierra was reported on November 3, 2015:

24 THE TRANSMISSION SEEMS TO SLIP OR HESITATE AT TAKEOFF. THE  
25 RUNNING LIGHTS ARE TOO DIM TO SEE DOWN THE ROAD.

26 141. Another incident involving a GMC Sierra was reported on July 22, 2016:

27 2015 GMC SIERRA HAS A DELAY THROTTLE RESPONSE. DOES IT AT ALL  
28 SPEEDS AND FROM TAKE OFF. TOOK TO DEALER AND SERVICE ADVISOR  
PULLED TRUCK IN SHOP. GOT OUT AND SAID IT DOES HAVE A DELAY.  
THE RAN VIN NUMBER THROUGH GMC DATA BASE AND TOLD ME.  
MANUFACTURE SAID IT WAS A NORMAL THING. IT'S NOT NORMAL AND  
NEVER HAD A VEHICLE WITH A THROTTLE DELAY.

142. Another incident involving a 2015 GMC Sierra was reported on July 25, 2016:

DELAYED ENGAGEMENT IN DRIVE, TRANSMISSION CLUNKS, RPM  
FLARES AND TRUCK QUITS MOVING UNEXPECTEDLY. SHUDDER AT 3- 50  
MPH, VIBRATES STEERING WHEEL AND LEAVES AN UNEASY FEELING  
THE TRUCK IS GOING TO QUIT MOVING.

143. Another incident involving a GMC Sierra was reported on September 10, 2016:

1 FIRST OF ALL THE HEADLIGHTS ARE VERY DIM AND AT NIGHT CANNOT  
2 SEE NOTHING.DEALER SAID IT IS WHAT IS .VERY BAD !! ALSO MY  
3 SIERRA ON WINDOW STICKER STATES COMES WITH ALL TERRAIN TIRES  
4 IT DOES NOT HAVE ALL TERRAIN TIRES . THEY ARE 265/65/R18  
5 GOODYEAR WRANGLER SRA .I WORKED FOR GOODYEAR AND THOSE  
6 TIRES ARE ALL SEASON !!! NOT ALL TERRAIN AS SPECIFIED ON WINDOW  
7 STICKER !! I TALKED TO DEALER AND CALLED CUSTOMER SERVICE AT  
8 GM THEY NEVER CALL BACK AND THEY SAID THOSE ARE THE RIGHT  
9 TIRES.THEY ARE NOT ACCORDING TO MY ATTORNEY WHO STATES THE  
10 WINDOW STICKER IS TOTALLY INCORRECT AND IS FRAUDULENT  
11 CHECK YOUR TIRES AND WINDOW STICKERS AND COMPARE AND LOOK  
12 ON GOODYEARS WEBSITE YOU WILL SEE.ALSO MY TRANSMISSION  
13 CLUNKS AND KNOCKS AND SHIFTS INCORRECTLY DEALER STATES ITS  
14 NORMAL I SPEND 40K ON A NEW TRUCK AND ALL I HAVE ARE  
15 PROBLEMS AND GM DOES NOTHING. IT DOWNSHIFTS HORRIBLE WHAT  
16 CAN I DO???

11 144. Another incident involving a GMC Sierra was reported on December 2, 2016:

12 TL\* THE CONTACT OWNS A 2015 GMC SIERRA 1500. WHILE DRIVING  
13 VARIOUS SPEEDS, THE TRANSMISSION VIBRATED AND CAUSED A  
14 HESITATION WHEN THE GEARS SHIFTED WITHOUT WARNING. THE  
15 VEHICLE WAS TAKEN TO THE DEALER AND REPAIRED; HOWEVER, THE  
16 FAILURE RECURRED SEVERAL TIMES. THE MANUFACTURER WAS MADE  
17 AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 50.

16 145. Another incident involving a 2015 GMC Sierra was reported on December 8, 2016:

17 EXTREME LAG/DELAY- HARSH ENGAGEMENT WHEN SHIFTING FROM  
18 PARK TO REVERSE. ITS LIKE YOU ARE BACKING INTO SOMETHING?  
19 WHEN CRUISING 28-32 MPH AND RELEASING ACCELERATOR(AS IF YOU  
20 WERE COASTING INTO A TURN) WHEN SLOWING THE VEHICLE SEEMS  
21 TO SHIFT UP AND LUNGE ENTERING THE TURN.

20 CLUNKS AND SHIFTS HARD WHEN CRUISING NORMALLY WHEN YOU  
21 HAVE TO RELEASE THE GAS PEDAL AND SLIGHTLY REACCELERATE,  
22 CAUSING THE DRIVER TO HESITATE.

22 VEHICLE SHUTTERS AND HARD ACCEL 10X WORSE WHEN TOWING A  
23 7000 # TRAILER (TRUCK IS RATED OVER 12,000 LBS. TOWING).

24 146. The following incident was reported on March 21, 2016 as to a 2016 GMC Sierra:

25 WHILE DRIVING MY TRUCK, IT HAS HAD 3 ALERTS ON DASH FOR  
26 "SERVICE STABILITRAK, POWER STEERING USE CAUTION AND TRAILER  
27 BRAKE." VEHICLE GAUGES ALL DROP TO ZERO WHILE OPERATING  
28 VEHICLE AND GO ON AND OFF. THE VEHICLE WHEN THIS OCCURS ALSO  
DISENGAGES FROM GEAR, VEHICLE IS AN AUTOMATIC. THEN ENGINE  
REVS UP WHEN IT SLIPS OUT OF GEAR AND GENERALLY GOES BACK IN

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GEAR AS GAUGES COME BACK ON. THE POWER STEERING SEEMS TO ALSO LOSE SOME POWER. WHEN THIS OCCURS, IF YOU DEPRESS THE GAS PEDAL, YOU DO NOT GET ANY MORE POWER. THIS IS TECHNICALLY THE 6TH OCCURRENCE. IT HAS BEEN BACK TO DEALER (GRIFFIN GMC OF MONROE, NC) AND COMPUTER CODES WERE CLEARED AND NOTHING REPORTED IE...TECHNICALLY FOUND THAT WOULD CAUSE THIS ISSUE PER THE DEALERSHIP AS UNABLE TO RE-PRODUCE THE CAUSE. I RETURNED THE TRUCK TODAY AFTER THIS 6TH OCCURRENCE DUE TO MY FEAR OF DRIVING THE VEHICLE WITH MY CHILDREN AND GETTING INVOLVED IN AN ACCIDENT. I HAVE VIDEO OF THIS LAST OCCURRENCE OF DASHBOARD GAUGES AND SHARED THEM WITH THE DEALERSHIP. FIRST OCCURRENCE PICTURES ARE FEB 29, 2016 AND SUNDAY, MARCH 20, 2016. VEHICLE HAS APPROXIMATELY 2000 MILES ON ODOMETER. ENTIRE TIME, VEHICLE HAS BEEN RUNNING ON LOCAL ROAD, EITHER AT STOP OR DRIVING BELOW 45MPH MOVING STRAIGHT AHEAD. I COULD NOT REPLICATE OR CAUSE THE ISSUE TO HAPPEN AGAIN ON PURPOSE, VERY RANDOM.

147. Another incident involving a GMC Sierra was reported on September 8, 2016:

TL\* THE CONTACT OWNS A 2016 GMC SIERRA 1500. WHEN THE SHIFTER WAS ENGAGED, THE VEHICLE DID NOT REGISTER THE CORRECT GEAR AND FAILED TO MOVE. WHEN THE VEHICLE DID RECOGNIZE THE CORRECT GEAR, IT ACCELERATED UNINTENTIONALLY. THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE TRANSMISSION WAS DEFECTIVE AND PARTS IN THE TRANSMISSION NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE RECURRED. THE VEHICLE WAS RETURNED TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE TRANSMISSION NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 150. UPDATED 10/18/16\*LJ

148. Another incident involving a GMC Sierra was reported on May 3, 2017:

GM 8 SPEED TRANSMISSION IS FULL OF PROBLEM. IT CONSTANTLY HESITATES, HANG GEARS, BUCKS, AND POSES VARIOUS SAFETY CONCERNS. FOR INSTANCE IF MERGING ONTO THE HIGHWAY THE TRANSMISSION WILL HESITATE AND THE TRUCK WILL BE UNRESPONSIVE TO GAS PEDAL INPUT FOR A PERIOD OF TIME SOMETIMES UP TO 12 SECS. THIS HESITATION CAUSES A SAFETY CONCERN WHEN ATTEMPTING TO MERGE INTO TRAFFIC. GM ACKNOWLEDGES THESE CONCERNS BUT STATES THAT IT IS OPERATING AS DESIGNED BUT ARE WORKING ON SOFTWARE UPDATES TO IMPROVE TRANSMISSION PERFORMANCE. THIS HAS BEEN A CONSTANT ISSUE SINCE I PURCHASED THE TRUCK.

149. Another incident involving a GMC Sierra was reported on May 4, 2017:

1 8 SPEED TRANSMISSION BUCKS, HESITATES, LURCHES FORWARD,  
2 CLUNKS, WHILE IN DRIVE. THE CONTINENTAL TIRES ARE CUPPING,  
3 WHICH GM SAYS IS CHARACTERISTIC OF THE BRAND. THE TRUCK  
4 VIBRATES WHILE AT 25MPH, AROUND 50MPH AND 65-75MPH. WHILE IN  
AWD/4WD AT 30 AND 50MPH, THE DRIVELINE MAKES A WHINING NOISE  
AND VIBRATES SOMETIMES.

5 150. Another incident involving a GMC Sierra was reported on September 15, 2017:

6 THIS ISSUE STARTED A FEW MONTHS AFTER I PURCHASED THE TRUCK  
7 TOOK IT TO TWO DEALERS THEY SAY ITS NORMAL. CALLED GMC &  
8 THEY HAVE NO RECALL. WHEN DRIVING THE TRUCK & HAVE TO SLOW  
9 DOWN IN TRAFFIC THE AUTOMATIC TRANSMISSION DOWN SHIFTS &  
10 HAS A VERY NOTICABLE JERK. WILL ACTUALLY JERK THE HOLE TRUCK.  
11 PEOPLE WHO HAVE RODE WITH ME TELL ME I HAVE A TRANSMISSION  
12 PROBLEM. WHAT CAN I DO

13 151. Another incident involving a GMC Sierra was reported on March 20, 2018:

14 PLEASE MAKE GM RESOLVE THE ISSUES WITH THE 8 SPEED  
15 TRANSMISSIONS IN THE TRUCKS. 2016 SL T Z71. I PURCHASED THE  
16 TRUCK NEW. IT'S NEVER SHIFTED PROPERLY. HESITATIONS, CLUNKING,  
17 JERKING, SHUTTER, HARD DOWN SHIFTS .... EVERYTIME I TAKE IT IN,  
18 THEY SAY IT'S DUE FOR AN UPDATE. THE TRUCK HAS HAD 4 UPDATES  
19 AND NONE OF THEM HAVE FIXED A THING. I HAD IT IN BEFORE THE  
20 36,000 MILE BUMPER TO BUMPER WARRANTY WAS UP AND WAS TOLD  
21 IT WAS UP TO DATE. THEN LAST WEEK, I TOOK IT IN AND WAS TOLD IT  
22 WAS "SEVERAL UPDATES BEHIND." (54,XXX) MILES. TO TOP IT OFF,  
23 GENERAL MOTORS WOULDN'T PAY FOR THE \$400 UPDATE, WHICH  
24 DIDN'T FIX ANYTHING AT ALL!!! THE TRUCK JERKED BEFORE WE GOT  
25 A BLOCK FROM THE DEALERSHIP. GM SAYS THAT EVEN THOUGH THE  
26 TRUCK IS STILL UNDER A FACTORY 60,000 MILE POWERTRAIN  
27 WARRANTY, TRANSMISSION UPDATES ARENT COVERED. THE 120,000  
28 EXTENDED WARRANTY WOULDN'T COVER IT BECAUSE THEY SAY IT  
SHOULD BE COVERED UNDER THE FACTORY POWERTRAIN WARRANTY!  
I ABSOLUTELY LOVE THE TRUCK OTHER THAN THE JUNK  
TRANSMISSION IN IT. I DON'T THINK IT'S SAFE OR MUCH FUN HAVING A  
VEHICLE THAT STARTS TO GO THEN FALLS FLAT ON ITS FACE FOR A  
FEW SECONDS BEFORE SLAMMING INTO THE NEXT GEAR. THIS IS A  
MAJOR PROBLEM WITH A HUGE NUMBER OF TRUCKS. DON'T BELIEVE  
ME? GOOGLE "2016 SIERRA TRANSMISSION ISSUE" OR ANYTHING OF  
THE SORT. YOU'LL SEE. I'M REALLY NOT ASKING FOR MUCH. I DIDN'T  
WANT TO PUT MY FAMILY IN A POTENTIALLY UNSAFE VEHICLE ..... YET  
HERE WE ARE. LIKE I SAID, I'M NOT ASKING FOR MUCH. ALL I WANT IS  
FOR MY TRUCK TO SHIFT NORMAL. TO GO WHEN IT NEEDS OR HAS TO.  
MY TRUCK HAS HAD 4 UPDATES AND WAS SEVERAL UPDATES BEHIND  
LAST TIME, THAT'S ROUGHLY AN UPDATE EVERY 10,000 MILES AND  
NOW THEY'RE NOT COVERED? ON TWO SEPARATE OCCASIONS, IT'S  
SHIFTED SO HARD THAT IT JARRED MY NECK AND MADE IT SORE FOR A

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FEW DAYS IVE EVEN PULLED OVER ON THE SIDE OF THE ROAD THINKING WE WERE REAR-ENDED. SO HAS MY WIFE. NOT SAFE-NOT NECESSARY!

152. Another incident involving a GMC Sierra was reported on July 30, 2018:

TRUCK SHIFTS REALLY HARD AND IS UNPREDICTABLE. I ALMOST DROVE THROUGH MY GARAGE DOOR THE OTHER DAY SHIFTING TO DRIVE FROM REVERSE. TRUCK WILL LUNGE FORWARD OR DELAY IN SHIFTING. THERE HAVE BEEN A FEW TIMES IVE HAD TO SLAM ON THE BRAKES BEFORE I BACKED INTO SOMETHING. I HAVE BROUGHT IT IN 3-4 TIMES FOR THE ISSUE AND GMC WONT REMEDY THE PROBLEM.

153. Another incident involving a GMC Sierra was reported on August 8, 2018:

8 SPEED TRANSMISSION BUCKS, HESITATES, LURCHES FORWARD, CLUNKS, WHILE STARTUNG ACCELERATION OR COMING TO A STOP. I TRY TO KEEP A BIG GAP BETWEEN MY TRUCK AND CARS IN FRONT OF ME AT STOP SIGNS BECAUSE IT RANDOMLY LURCHES FORWARD AND I ALMOST HAVE BUMPED CARS IN FRONT OF ME. I HAVE HAD THE TRUCK INTO THE DEALER SO MANU TIMES TO FIX THE VIBRATION ISSUES AS WELL, THEY SAID 3 TIRES THAT CAME IN THE BRAND NEW TRUCK WERE DEFECTIVE SO I HAD TO REPLACE THEM ALL AND THE SHAKE IS STILL THERE, THE BALANCED, REBALANCED, ROAD FORCE BALANCE AND NOTHING WORKS. LAST TIME AT THE DEALER SAID IT IS PROBABLY THE TIRES, HE SAID DON'T ROTATE THEM AGAIN AND WHEN THEY WEAR OUT HE WILL PUT ME IN A BETTER TIRE. I AM PAST MY WARRANTY SO THE DEALER SAYS ANY COSTS ARE MY RESPONSIBILITT, IF THE NHTSA COULD PLEASE STEP IN TO ASSIST US TO MAKE GM FIC THEAE VEHICLES WHICH ARE A SAFETY HAZARD.

154. Another incident involving a GMC Sierra was reported on September 21, 2018:

TRANSMISSION - WHEN DRIVING THE VEHICLE IT DOES A HARD SHIFT WHEN ACCELERATING AND DECELERATING. I HAVE TAKEN THE VEHICLE INTO THE DEALER TWICE. THEY ARE SAYING THAT IS A "STATE OF THE ART" COMPUTER THAT NEEDS TO BE RESET!!! I AM TAKING IT BACK IN FOR A 3RD TIME. THE CARE IS 2 YEARS OLD WITH 31 K MILES.

155. Another incident involving a GMC Sierra was reported on October 27, 2018:

TRANSMISSION SHIFTS ABRUPTLY AND TORQUE CONVERTER CAUSES SHUDDER AT HIGHWAY SPEEDS. TRUCK HAS BEEN SERVICED TWICE FOR THE SAME ISSUE BY DEALER AND DEALER RECENTLY TOLD ME PROBLEM IS UNRESOLVABLE.

156. Another incident involving a GMC Sierra was reported on November 6, 2018:

1 THE CONTACT OWNS A 2016 GMC SIERRA 1500. WHILE DRIVING 65 MPH  
2 IN STOP AND GO TRAFFIC, THE CONTACT DETECTED A SHUTTER AND  
3 HEARD AN ABNORMAL NOISE WHEN SHIFTING GEARS. THE VEHICLE  
4 WAS TAKEN TO MARTY'S BUICK GMC ... WHERE THE TRANSMISSION  
5 WAS REPROGRAMMED AND FLUSHED. THE VEHICLE WAS THEN TAKEN  
6 TO BEST CHEVROLET . . . WHERE THE CONTACT WAS INFORMED THAT  
7 THE CAUSE OF THE FAILURE COULD NOT BE DETERMINED. THE  
8 VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS MADE  
9 AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 96,794.

10 157. An incident involving a 2017 GMC Sierra was reported on July 20, 2017:

11 THE CONTACT OWNS A 2017 GMC SIERRA 1500. WHILE DRIVING 30 MPH,  
12 THE TRANSMISSION FAILED AFTER A COMPLETE STOP. WHEN THE  
13 ACCELERATOR PEDAL WAS DEPRESSED, THE RPMS INCREASED. WHEN  
14 SHIFTING FROM SECOND TO FIRST GEAR, THE TRANSMISSION SHIFTED  
15 INTO FIRST GEAR WITH EXTREME FORCE AND CAUSED THE VEHICLE TO  
16 ABRUPTLY ACCELERATE. THE CONTACT HAD TO ENGAGE THE BRAKE  
17 PEDAL WITH FORCE TO AVOID A CRASH. THE FAILURE WAS  
18 EXPERIENCED NUMEROUS TIMES. THE VEHICLE WAS TAKEN TO WALSH  
19 CHEVY BUICK GMC (2330 NORTH BLOOMINGTON STREET, STREATOR, IL,  
20 61364 815-673-4333) WHERE THE TRANSMISSION SYSTEM WAS  
21 REPROGRAMMED TWICE AND THE ELECTRONIC CONTROL MODULE  
22 WAS REPLACED. HOWEVER, THE FAILURE WAS NOT CORRECTED. THE  
23 MANUFACTURER WAS NOTIFIED. THE FAILURE MILEAGE WAS 112.  
24 UPDATED 08/30/17\*LJ

25 158. Another incident involving a GMC Sierra was reported on July 27, 2017:

26 THE CONTACT OWNS A 2017 GMC SIERRA. WHILE DRIVING  
27 APPROXIMATELY 5 MPH, THE VEHICLE FAILED TO SHIFT OUT OF GEAR  
28 AND THERE WAS A DELAY OF THREE TO FOUR SECONDS BEFORE  
SHIFTING INTO SECOND GEAR. THE FAILURE RECURRED EVERY  
MORNING. THE VEHICLE WAS TAKEN TO THE DEALER (JIM CAUSLEY,  
LOCATED AT 38111 GRATIOT AVE, CLINTON TOWNSHIP, MI 48036)  
WHERE IT WAS CONFIRMED THAT GM WAS AWARE OF THE ISSUE. THE  
VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER  
WAS NOTIFIED OF THE FAILURE AND INFORMED THE CONTACT THAT  
THERE WAS NO RECALL ON HIS VIN. NO FURTHER ASSISTANCE WAS  
OFFERED. THE APPROXIMATE FAILURE MILEAGE WAS 4,500. UPDATED  
11/13/17 \*BF

159. Another incident involving a GMC Sierra was reported on October 17, 2017:

UNINTENDED ACCELERATION – WHEN SLOWING DOWN TO COME TO A  
STOP THE VEHICLE WILL OCCASIONALLY ENGAGE A LOWER GEAR  
VERY SUDDENLY AND LURCH FORWARD. THE RESULTING FORCE IS  
ENOUGH TO OVERPOWER THE BRAKING EFFORT BEING PROVIDED BY  
THE DRIVER AND THE VEHICLE WILL MOVE FORWARD SEVERAL FEET

1 BEFORE THE DRIVER CAN REACT AND APPLY MORE BRAKING FORCE TO  
2 STOP THE VEHICLE. THE ISSUE OCCURS RANDOMLY AND  
3 INFREQUENTLY AT VERY SLOW SPEEDS (5-10MPH). THERE HAVE BEEN  
4 SEVERAL OCCASIONS WHERE I'VE BEEN BRAKING TO STOP AT A STOP  
5 LIGHT AND BEEN FORCED INTO THE MIDDLE OF AN INTERSECTION. I'M  
6 CONCERNED THE ISSUE COULD CAUSE THE VEHICLE TO STRIKE THE  
7 CAR IN FRONT OF IT OR A PEDESTRIAN CROSSING IN FRONT OF THE  
8 VEHICLE AS IT STOPS FOR A CROSSWALK. MULTIPLE UNSUCCESSFUL  
9 REPAIR ATTEMPTS HAVE BEEN MADE BY THE DEALER. I ATTEMPTED TO  
10 FORCE THE MANUFACTURER TO BUY THE VEHICLE BACK FROM ME  
11 THROUGH THE MASSACHUSETTS LEMON LAW AND SINCE THAT TIME  
12 THEY HAVE DENIED THE EXISTENCE OF A PROBLEM. I HAVE SEEN  
13 SEVERAL INSTANCES ONLINE WHERE CONSUMERS WITH THE  
14 IDENTICAL VEHICLE (ALL WITH THE 8 SPEED TRANSMISSION)  
15 COMPLAINED OF THE SAME PROBLEM.

16 160. Another incident involving a GMC Sierra was reported on February 23, 2018:

17 TRANSMISSION HARSH 1-2 SHIFT WHEN IT IS UNDER LIGHT THROTTLE  
18 AND SOMETIME DOES NOT SHIFT OR MAKE NOISE. GMC DEALER ARE  
19 AWARE ABOUT THIS ISSUES ON ALL GM TRUCK MODEL OF 2015 TO 2017  
20 WITH 8SPED TRANSMISSION SINCE APRIL 2017. I HAVE ATTACHED  
21 DOCUMENTS GIVEN BY DEALER.

22 161. Another incident involving a 2017 GMC Sierra was reported on June 1, 2018:

23 WHEN DRIVING AT SLOW PARKING LOT SPEEDS OR WHEN COMING TO  
24 A COMPLETE STOP THE VEHICLE INTERMITTENTLY LUNGES, SURGES  
25 OR JOLTS, CAUSING THE VEHICLE TO MOVE FORWARD OR BACKWARDS  
26 UNANTICIPATED. SOMETIMES THE JOLT FEELS LIKE ANOTHER VEHICLE  
27 HAS HIT THIS VEHICLE FROM THE REAR, AGAIN CAUSING IT TO LUNGE  
28 FORWARD.

162. Another incident involving a 2017 GMC Sierra was reported on June 15, 2018:

I BOUGHT THIS TRUCK USED WITH 12,918 MILES ON IT, APRIL 2018. WHEN  
DRIVING(ESPECIALLY ON HIGHWAY), AND CHANGING SPEEDS,  
TRANSMISSION CLUNKS AND LURCHES-AUTOMATIC TRANSMISSION. IT  
SOUNDS AND FEELS AS IF DRIVE TRAIN WILL FALL OUT. I HAVE TAKEN  
IT TO DEALER TWICE. THE FIRST TIME, THEY KEPT IT FOR 3 DAYS, THE  
SECOND TIME, FOR ONE. THE MECHANIC IS ABLE TO REPLICATE THE  
NOISE/LURCHING, BUT THEY ARE UNABLE TO FIND A CAUSE OR  
CORRECTION. THEY TELL ME IT IS NOT DANGEROUS, BUT I AM  
CONCERNED THAT THE NOISE/MOVEMENT, COULD CAUSE MYSELF OR  
ANOTHER FAMILY MEMBER TO SWERVE OR BRAKE HARD AND CAUSE  
AN ACCIDENT. THE MECHANIC HAS TRIED "UPDATING THE SOFTWARE"  
BUT THAT DID NOT FIX IT. SEVERAL OTHER GMC SIERRA OWNERS TELL  
ME THEY HAVE HAD SAME PROBLEM.

1 163. Another incident involving a GMC Sierra was reported on December 6, 2018:

2 THE TRANSMISSION SHIFTS EXTREMELY ROUGH FROM 1ST TO 2ND  
3 GEAR IN PARKING LOTS AT A SLOW SPEED AND ON NORMAL HIGHWAY  
4 OR STREET DRIVING AND EXPERIENCES THE SAME THING WHILE  
5 SLOWING DOWN TO STOP 2. THE ENGINE HAS RECENTLY BEEN HAVING  
6 A AWKWARD SHAKE TO IT WHILE IN IDEAL AFTER IT HAS BEEN  
7 RUNNING AND WARM 3. WHILE BACKING UP AND TURNING THE WHEEL,  
8 THE FRONT SUSPENSION WILL LET OUT A LOUD CLUNK SOUND AND  
9 THE SOUND WILL RETURN WHEN TURNING THE TRANSMISSIONS BACK  
10 FORWARD AFTER PUTTING IT INTO DRIVE.

11 164. Another incident involving a 2017 GMC Sierra was reported on December 18, 2018:

12 I HAVE HAD SEVERAL INSTANCES WHERE YOU PUSH THE  
13 ACCELERATOR AND YOU START TO GO AND THEN IT JUST STOPS  
14 MOVING LIKE THE TRANSMISSION HAS DISENGAGED. STARTED TO  
15 TURN INTO ONCOMING TRAFFIC THIS MORNING AND HAD TO STOP AS  
16 AS IT DID THIS AND I WAS GOING TO GET HIT!!! IT DOES IT A LOT, FIRST  
17 TIME I WOULD HAVE BEEN HIT!!! GM SAYS THEY KNOW IT'S A  
18 PROBLEM, AT SHOP NOW AGAIN FOR IT! GOING TO GET SOMEONE  
19 KILLED!!!!

20 165. Another incident involving a 2017 GMC Sierra was reported on January 10, 2019:

21 TRANSMISSION HAS SURGING AND HESITATION. DEALER CANNOT FIX.

22 166. Another incident involving a 2017 GMC Sierra was reported on February 4, 2019:

23 TRUCK LAGS POWER WHEN PRESSING THE GAS PEDAL AT TIMES AFTER  
24 PUTTING TRANSMISSION INTO DRIVE FROM REVERSE. TRANSMISSION  
25 SHIFTS HARD INTO AND OUT OF FIRST GEAR AND AT TIMES FEELS LIKE  
26 IT IS SKIPPING 2ND GEAR DURING A DOWNSHIFT.

27 167. Another incident involving a 2017 GMC Sierra was reported on March 12, 2019:

28 TRANSMISSION SHIFT FROM 1ST GEAR. THERE IS A PROBLEM IN THE  
GEAR SHIFT FROM 1ST TO 2ND IT SLAMS THE TRANSMISSION WHEN YOU  
STOP AND START. THERE IS A HEATER IN THE TRANSMISSION THAT  
PUTS EXTRA DEGRADATION ON THE OIL CAUSING IT TO NEED  
REPLACEMENT VERY EARLY. DEALER KNOWS OF THE ISSUE BUT HAS  
NO FIX FOR IT ONLY STATED THEY NOTED THE FILE IN CASE IT FAILS.  
UNACCEPATABLE FOR A 55,000. PLEASE LOOK INTO THIS.

168. On January 8, 2019, the following was reported as to a 2018 GM Sierra:

BRAND NEW 2018 SIERRA 1500 Z71. WHEN DRIVING THE TRUCK FOR  
THE FIRST TIME AFTER SITTING FOR A NUMBER OF HOURS (6+HRS) THE  
TRUCK EXPERIENCES A "HARD" 1-2 SHIFT. THIS OCCURS 100% OF THE

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TIME WHEN I LEAVE FOR WORK IN THE MORNING. SOMETIMES IT FEELS LIKE THE TRANSMISSION SLIPPED, THIS IS THE HARD SHIFT FEELING. OTHER TIMES THE TRUCK LOSES ACCELERATION, CUTS OUT, FEELS LIKE THE TRUCK HAS RAN OUT OF FUEL. ONLY HAPPENS WHEN THE TRUCK HAS BEEN SITTING FOR A LONG PERIOD. WHEN I TOOK THE TRUCK IN TO HAVE THIS LOOKED INTO I WAS TOLD THIS IS A KNOWN ISSUE WITHOUT A RESOLUTION. IVE ATTACHED A SCAN'D COPY OF THE DOCUMENT THEY GAVE ME #16-NA-361.

169. On February 14, 2019, the following was reported:

EXTREMELY HARD SHIFTING ON LOWER GEARS. WHEN SLOWING WHEN IT GOES FROM 2ND TO 1ST IT FEELS LIKE I GOT REAR-ENDED. NOT ALL THE TIME BUT ONCE A DAY AT LEAST. IT ALSO SHUDDERS WHEN SLOWLY ACCELERATING IN TRAFFIC, SOMETIMES THE RPM GOES WAY HIGH AND IT LURCHES FORWARD WHEN IT UPSHIFTS.

170. On April 2, 2019, the following was reported:

WHILE THE TRUCK IS IN MOTION AND WHEN ACCELERATING AROUND 15-20 MPH THE TRANSMISSION WILL SOMETIMES "HUNT" FOR A GEAR CAUSING THE TRUCK TO NOT ACCELERATE. THIS RESULTS IN A MILD JERKING OF THE TRUCK WHEN IT IS TRYING TO ACCELERATE AND FEELS LIKE THE TRANSMISSION IS SLIPPING/SKIPPING. THIS IS MORE APPARENT WHEN GOING UP A GRADE VERSUS ON A FLAT SURFACE. SO I HAVE TO PUSH HARDER ON THE GAS PEDAL WAITING FOR THE TRUCK TO SHIFT. THIS IS A SAFETY ISSUE SINCE WHEN NOT PROPERLY ACCELERATING INTO TRAFFIC, AN ACCIDENT IS MORE LIKELY TO OCCUR. I SEE THAT THIS ISSUE HAS ALREADY BEEN REPORTED IN ANOTHER INCIDENT ON YOUR WEBSITE. I HAVE HAD THIS ISSUE SINCE I BOUGHT THE TRUCK ON 02/2018 AND THE REASON I HAVE WAITED TO REPORT IS DUE TO THE DEALER STATING TO ALLOW THE COMPUTER TO UPDATE/LEARN YOUR DRIVING HABITS. I HAVE 11,000 MILES ON THE TRUCK NOW AND STILL EXPERIENCING THE ISSUE.

171. On April 25, 2019, the following incident was reported as to a 2019 GMC Sierra:

TRANSMISSION JERKS INTO GEAR WHEN SLOWING DOWN. WHEN SPEEDING UP TRUCK WILL JERK. SERVICE MANAGER SAID IT WAS NORMAL TRUCK FEELS LIKE IT THE REAR END FALLS OUT WHEN STOPPING.

172. On July 23, 2019, the following incident was reported:

RECENTLY PURCHASED A 2019 GMC SIERRA AND IT SHIFTS HARD AT LOWER SPEEDS OR WHEN MOVING FROM A STOPPED POSITION AND THEN ACCELERATING, OR WHEN DECELERATING. WHILE PARKING THE CAR AT ONE POINT THE SHIFT WAS SO HARD THAT IT FELT LIKE A HIT, AND THEN THE KIDS CONFUSEDLY ASKING 'WHAT WAS THAT?'. GM IS

1 GIVING US THE RUNAROUND AND UNWILLING TO FIX WHAT I HAVE  
2 NOW FOUND OUT, HAS BEEN A KNOWN PROBLEM. THEY BASED  
3 EVERYTHING OUT OF WHAT THE MODULES REPORT WHEN THE CAR IS  
4 HOOKED UP TO THE COMPUTER BASICALLY, IF THE MODULES ARE OK  
5 THEN THE CAR IS REPORTEDLY OK. NOT THE CASE.

6 173. On August 23, 2019, the following incident was reported:

7 TL' THE CONTACT OWNS A 2019 GMC SIERRA 1500. WHILE DRIVING 10  
8 MPH, THE CONTACT HEARD AN ABNORMAL NOISE AND THE VEHICLE  
9 BEGAN TO HESITATE. THERE WERE NO WARNING INDICATORS  
10 ILLUMINATED. THE CONTACT ALSO STATED THAT THE VEHICLE  
11 DOWNSHIFTED FROM THIRD TO FIRST GEAR INDEPENDENTLY. THE  
12 VEHICLE WAS TAKEN TO GEOFF PENSKE BUICK GMC (LOCATED AT 100  
13 S MUSEUM RD, SHILUNGTON, PA 19607, (610) 370-6673) TO BE  
14 DIAGNOSED, BUT THE FAILURE COULD NOT BE DUPUCATED. THE  
15 VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT  
16 NOTIFIED. THE FAILURE MILEAGE WAS 5,500. THE CONSUMER STATED  
17 WHEN AT A TRAFFIC UGHT CAR, IT CLUNKS AND DROPPING INTO FIRST  
18 GEAR WHEN COMING TO A STOP •TR WHEN STOPPING FOR TRAFFIC THE  
19 TRANSMISSION SEEMS TO 'CLUNK AS IF IT IS IN A HIGHER GEAR AND  
20 THEN DROPS INTO FIRST AFTER THE VEHICLE COMES TO A STOP.  
21 FEELING UKE THE GEARS ARE MOVING WHEN THE VEHICLE IS NOT.  
22 WHEN LEAVING A STOP IT SOMETIMES HESITATE AND THE ENGINE  
23 WILL REV UKE IT IS IN NEUTRAL THEN QUICKLY LUNGE FORWARD AT  
24 TIMES SO HARD IT FEELS LIKE IT HAS BEEN HIT FROM BEHIND.\*JB

25 174. On August 12, 2020, the following was reported as to a 2020 GMC Sierra:

26 AT 550 MILES HAD TO TOW TO DEALER. THEY SAID NEEDED TO  
27 REPROGRAM TRANSMISSION. NOW AT 4000 MILES, WENT TO START AND  
28 VEHICLE WILL NOT DO ANYTHING. NO POWER. IT IS BEING TOWED TO  
DEALER AGAIN. PRETTY MUCH BOUGHT A LEMON AS IT LOOKS NOW.

175. On September 23, 2020, the following was reported:

TRANSMISSION KICKS WHEN COMING TO A COMPLETE STOP.

176. On May 27, 2021, the following "hard" shifting was reported during both up and down  
shifting for a 2021 GMC Sierra:

TRANSMISSION SHIFTS HARD WHEN SHIFTING UP AND WHEN  
DOWNSHIFTING. VEHICLE JERKS WHEN GOING SPEEDS <40 AFTER  
COMING OFF HIGHWAY AT HIGHWAY SPEEDS >70.

**d. GMC Canyon**

177. An incident involving a 2017 GMC Canyon was reported on August 1, 2018:

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28

TRANSMISSION BEGAN SHIFTING HARD. BEFORE LONG WHOLE TRUCK RATTLED WHEN SHIFTING. ALMOST A GRINDING SOUND. CHEVY DIAGNOSED TORQUE CONVERTER HAS GONE BAD. BACK ORDERED FOR 2 WEEKS.

178. Another incident involving a 2017 GMC Canyon was reported on December 31, 2018:

TORQUE CONVERTER FAILS AT 12000 MILES FOR MANY. THERE IS A GMC NOTICE OUT SINCE 2016. MINE FAILED AT 16000 MILES AND THE ONE THEY REPLACED WILL LIKELY FAIL AGAIN IN ANOTHER 16K MILES. THIS IS BAD. I NOTICED IT WHEN I PRESSED ON THE ACCELERATOR AND AS I INCREASED SPEED UP TO 45 MPH. IT RATTLED AND ROCKED BADLY. THE GMC REPAIRMAN SAID, "YEAP.....EVER SINCE 2016 ALL THESE DAMN TORQUE CONVERTERS HAVE BEEN FAILING IN THE CANYONS AND COLORADOS BECAUSE GM AND CHEVY CHANGED THE SIZE AND STRENGTH OF THE METAL USED IN ORDER TO REDUCE THE WEIGHT OF TRHE VEHICLE. WE WILL REPLACE IT, BUT I CAN ASSURE YOU IT WILL FAIL AGAIN AND YOU'LL HAVE TO BRING IT BACK TO USE FOR CHANGE OUT AGAIN." WOW....WHAT A BUNCH OF CRAP.

179. On August 28, 2018, the following incident was reported as to a 2018 GMC Canyon:

TRANSMISSION JERKS FROM 4TH TO 5TH. SOMETIMES FEELS LIKE SOMEONE HIT YOU IN THE REAR ENDED.

180. Another incident involving a 2018 GMC Canyon was reported on September 7, 2018:

TRANSMISSION CLUNKS FEELS LIKE YOUR HIT IN THE REAR END. I THOUGHT I WAS REAR ENDED 3 TIMES SO FAR. MY TRANSMISSION SURGES FORWARD FROM 4TH TO 5TH GEAR. VERY DANGEROUS TO WEAR I DON'T WANT TO DRIVE THE TRUCK.

181. Another incident involving a 2018 GMC Canyon was reported on September 7, 2018:

THE AUTOMATIC TRANSMISSION SHIFTS AGGRESSIVELY THE FIRST GEARS FROM A COLD STARTED ENGINE AFTER ENGAGING FROM PARK TO DRIVE. SLUGGISH SHIFTING AND ACCELERATION.

182. Another incident involving a 2018 GMC Canyon was reported on December 14,

2018:

RUMBLING OF TRANSMISSION. CLUCKY START. GM DEALER ACKNOWLEDGES THE PROBLEM AND HAS TRIED TO REPAIR VEHICLE. GM SAYS AT THIS TIME THE TRUCK 8 SPEED TRANSMISSIONS ARE NOT FIXABLE

183. On January 7, 2021, the following delayed acceleration and jerking was reported:

1 I AM THE OWNER OF A 2020 CANYON SLE THAT WAS PURCHASED IN  
2 JUNE OF 2020. THE VEHICLE HAS ABOUT 20,000 MILE ON IT CURRENTLY.  
3 I HAVE BEEN EXPERIENCING A “LAG” ON ACCELERATION AFTER  
4 COMING TO A STOP. THIS FEELS LIKE THE TRANSMISSION ISN’T DOWN  
5 SHIFTING ALL THE WAY. AT TIME WHEN ACCELERATING FROM A STOP  
6 THE TRUCK WILL ACT AS IT IS IN A HIGH GEAR THEN SUDDENLY SLAM  
7 INTO A FIRST GEAR. I HAVE TAKE MY TRUCK TO JESSUP GMC IN PALM  
8 SPRINGS AND THEY SAY THE TECH CAN NOT REPRODUCE THE  
9 PROBLEM. THIS SOUNDS LIKE THE SAME ISSUE THE 2015-2019 MODELS  
10 HAVE IN REFERENCE TO BULLETIN: 18-NA-355 DATED AUGUST 2019

11 184. On January 5, 2022, the following was reported, noting “downshift” issue and the  
12 dealer was “backed up for weeks” and unable to look at the car:

13 When rolling to stop signs or red lights, the vehicle occasionally fails to downshift  
14 properly and will attempt to continue pushing the vehicle when trying to stop. On  
15 multiple occasions, the vehicle acts as if it cannot be stopped due to the transmission  
16 failing to downshift. One must aggressively apply the brakes to get the vehicle to come  
17 to a stop. Unable to have the vehicle checked out at a local dealer, due to being backed  
18 up for weeks when trying to have it looked at. No visual indication/warning is given  
19 when this happens. There is a current class action lawsuit for models up to 2019, but  
20 this needs to be extended to 2020 models as well, as multiple online forums discuss  
21 this issue being prevalent in newer models of the 8-speed transmission.

22 **C. D. Plaintiffs’ Experiences**

23 **1. Matthew Barba’s Experience**

24 185. Plaintiff Matthew Barba purchased a new, 2019 Chevrolet Silverado 1500 from  
25 Selman Chevrolet in Orange, California. The vehicle was equipped with an 8L90 or 8L45  
26 transmission.

27 186. Plaintiff purchased the vehicle primarily for personal, family, or household use.

28 187. At all times, like other Class Members, Plaintiff has driven the vehicle in a foreseeable  
manner and in the way it was intended to be used.

188. Prior to purchase, while at the dealership, Plaintiff reviewed marketing materials for  
the vehicle online and test drove the vehicle he ultimately purchased.

1 189. At the time of purchase, Plaintiff reviewed the Class Vehicle's window sticker and  
2 discussed the purchase with an authorized dealer. Upon information and belief, Plaintiff's dealer did  
3 not have the same information about the Shift Defect, nor the duty to disclose it, as GM.

4 190. Plaintiff, acting as a reasonable consumer, relied on the materials he reviewed, and the  
5 discussions he had, before making his purchase.

6 191. None of the information provided to Plaintiff disclosed any defects in the vehicle or  
7 its transmission. GM's omissions were material to Plaintiff.

8 192. Shortly after purchase, Plaintiff's transmission exhibited hard shifting, clunking, and  
9 jerking. This Shift Defect reduced, and continues to reduce, Plaintiff's satisfaction with the vehicle.  
10 Also, the Shift Defect raises a safety concern.

11 193. On or about August 23, 2022, Plaintiff provided notice to GM about the Shift Defect  
12 when Mr. Barba brought the vehicle to Selman Chevrolet in Orange, California and advised of the  
13 transmission problems Plaintiff was having, including hard shifting into gears and harsh  
14 downshifting. At that time, Plaintiff had only 21,992 miles on the vehicle. The dealership  
15 reprogrammed the transmission control module.

16 194. On or about January 16, 2023, Plaintiff provided notice to GM about the Shift Defect  
17 when Mr. Barba brought the vehicle into Selman Chevrolet in Orange, California and advised of the  
18 transmission problems Plaintiff was having, including hard shifting with pausing and jerking. At that  
19 time, Plaintiff had only 25,771 miles on the vehicle. Plaintiff was advised this was a normal condition  
20 of the transmission and no repairs were attempted.

21 195. On or about August 5, 2025, Plaintiff also sent a notice letter to GM about the Shift  
22 Defect, to no avail.

23 196. Despite an attempted repair, GM's authorized dealership has failed to adequately  
24 repair Plaintiff's vehicle, which continues to exhibit a Shift Defect.  
25  
26  
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1 197. GM did not disclose the Shift Defect in its advertising materials, on its websites, or to  
2 its dealers. Had GM done so, Plaintiff would have learned of that material information and would not  
3 have purchased the vehicle or paid the price he paid for it.

4 198. As a result of the Shift Defect, Plaintiff has lost confidence in the ability of his Class  
5 Vehicle to provide safe and reliable transportation for its ordinary and advertised purpose and is,  
6 accordingly, unable to rely on GM's advertising or labeling in the future. Plaintiff does not intend to  
7 purchase another vehicle from GM in the future, though he would like to do so.  
8

9 **2. Renzo Calvo-Saez's Experience**

10 199. Plaintiff Renzo-Calvo-Saez purchased a new 2019 Chevrolet Silverado from Guaranty  
11 Chevrolet in Santa Ana, California. The vehicle was equipped with an 8L90 or 8L45 transmission.

12 200. Plaintiff purchased the vehicle primarily for personal, family, or household use.

13 201. At all times, like other Class Members, Plaintiff has driven the vehicle in a foreseeable  
14 manner and in the manner in which it was intended to be used.  
15

16 202. Prior to purchasing his Class Vehicle, Plaintiff researched the vehicle online. He had  
17 downed other Chevy vehicles, a Spark and a Cruze, and had not encountered any transmission issues.

18 203. At the time of purchase, Plaintiff reviewed marketing materials for the vehicle,  
19 reviewed the Class Vehicle's window sticker, took the vehicle for a test drive, and also discussed the  
20 purchase with an authorized dealer.  
21

22 204. Plaintiff, acting as a reasonable consumer, relied on the materials he reviewed, and the  
23 discussions he had, before making his purchase.

24 205. None of the information provided to Plaintiff disclosed any defects in the vehicle or  
25 its transmission. GM's omissions were material to Plaintiff.

26 206. Shortly after purchase, Plaintiff's transmission exhibited hard shifting and jerking  
27 especially when decelerating in lower gears. This Shift Defect reduced, and continues to reduce,  
28

1 Plaintiff's satisfaction with the vehicle. Also, the Shift Defect raises a safety concern with both  
2 Plaintiff and his wife, who declines to drive the vehicle.

3         207. On or about July 15, 2022, Plaintiff provided notice to GM about the Shift Defect  
4 when he brought the Vehicle into Simpson Chevrolet of Irvine, in Irvine, California because of the  
5 Shift Defect, which he experienced specifically when putting the vehicle into gear and when the  
6 vehicle was changing gears. He was informed the vehicle was operating normally. At that time,  
7 Plaintiff had approximately 21,161 miles on the vehicle.  
8

9         208. On or about March 21, 2023, Plaintiff provided notice to GM about the Shift Defect  
10 when he brought the vehicle into Simpson Chevrolet because of the Shift Defect, which he  
11 experienced as hesitation before shifting and then slamming into gear. He was informed his vehicle  
12 was experiencing harsh down shifts and the dealership reprogramed the transmission control module.  
13 At the time, Plaintiff had approximately 28,120 miles on the vehicle.  
14

15         209. On or about June 14, 2023, Plaintiff provided notice to GM about the Shift Defect  
16 when he brought the vehicle into Simpson Chevrolet because of the Shift Defect, which he  
17 experienced hard shifting during low gear and hesitation when moving out of reverse. He was  
18 informed the transmission was shifting as designed and has "normal back lash from park." At the  
19 time, Plaintiff had approximately 29,976 miles on the vehicle.  
20

21         210. On or about January 9, 2024, Plaintiff provided notice to GM about the Shift Defect  
22 when he brought the vehicle into Simpson Chevrolet because of the Shift Defect, which he  
23 experienced as jerking when shifting into drive. He was informed the transmission was shifting as  
24 designed. At the time, Plaintiff had approximately 34,012 miles on the vehicle.

25         211. On or about September 6, 2024, Plaintiff provided notice to GM about the Shift Defect  
26 when he brought the vehicle into Simpson Chevrolet because of the Shift Defect, which he  
27 experienced as a transmission stutter and jerk into second gear. He was informed the transmission  
28 was shifting as designed. At the time, Plaintiff had approximately 39,206 miles on the vehicle.

1           212. On or about August 7, 2025, a notice letter was sent to GM advising of the Shift Defect,  
2 to no avail.

3           213. Despite attempted repairs, GM's authorized dealership has failed to adequately repair  
4 Plaintiff's vehicle, which continues to exhibit a Shift Defect.

5           214. GM did not disclose the Shift Defect in its advertising materials, on its websites, or to  
6 its dealers. Had GM done so, Plaintiffs would have learned of that material information and would  
7 not have purchased the vehicle or paid the price he paid for it.

8           215. As a result of the Shift Defect, Plaintiff has lost confidence in the ability of his Class  
9 Vehicle to provide safe and reliable transportation for its ordinary and advertised purposes and are,  
10 accordingly, unable to rely on GM's advertising or labeling in the future. Plaintiff does not intend to  
11 purchase or another vehicle from GM in the future, though he would like to do so.

12  
13  
14           **D. 3. Fraudulent Concealment Allegations**

15           216. Plaintiffs' claims arise out of GM's fraudulent concealment of the Shift Defect and the  
16 problems it causes, and its representations about the quality, durability, and performance of the Class  
17 Vehicles, including their 8L90 and 8L45 transmissions.

18           217. Plaintiffs contacted counsel involved in *Speerly v. GM*, (the class action lawsuit  
19 involving Class Vehicles purchased before March 1, 2019) years after it was initiated, and further,  
20 only contacting counsel after press reports of the class certification in *Speerly v. GM* occurred on  
21 March 20, 2023. In the District Court's order, the Court rejected GM's argument it could not be  
22 decided class-wide whether it had concealed the Shudder and Shift Defects. The court noted GM's  
23 attempts to keep many of the documents listed in this Complaint sealed as further evidence that the  
24 full scope of GM's knowledge of the transmission problems remain hidden from the public:  
25

26           The defendant contends that the question of what it concealed cannot be  
27 resolved on a class-wide basis because public knowledge about the defect varied  
28 throughout the relevant class period. But that argument is disingenuous considering  
the defendant's recent efforts to conceal from public disclosure vast portions of the

1 record offered by the plaintiffs to show the existence of the defect and the defendant's  
2 historical knowledge of the same. ...

3 The record so far presented discloses ample proofs that could be offered in  
4 every instance to establish concealment. Most conspicuously, the defendant repeatedly  
5 argued in its motions to seal that hundreds of pages of reports produced by GM  
6 covering engineering investigations of the transmission problems and compilations of  
7 warranty service data were its "confidential information." The defendant further  
8 insisted that it had made concerted efforts to keep the information private, and that  
9 none of the documents previously had been disclosed by the defendant to the public.  
10 Whether the defendant disclosed the substance or conclusions of the hundreds of pages  
11 of investigative reports and engineering diagnoses of the transmission issues is a  
12 question that can be addressed by proofs common to the entire subclasses. The  
13 defendant insists that none of the information from its defect investigations ever was  
14 seen by the public prior to this litigation. Based on the record before this Court, it  
15 appears to be beyond dispute that none of that information ever came to light publicly  
16 until it was disclosed as part of the recent filings in this litigation. The defendant's  
17 determined efforts to maintain the "confidentiality" of the information defies any  
18 suggestion that any of the relevant information previously was disclosed by GM or its  
19 dealers to any buyers of class vehicles.

20 *Speerly v. GM*, ECF No. 284, PageID.20434-345. *See also Speerly v. GM*, ECF No. 265

21 (rejecting GM's motion to keep its internal documents regarding the Shudder and Shift Defects under  
22 seal).

23 218. To the extent Plaintiffs' claims arise from GM's fraudulent concealment, there is no  
24 one document or communication, and no one interaction, upon which Plaintiffs base their claims.  
25 Plaintiffs allege at all relevant times, including specifically at the time they purchased their Class  
26 Vehicles, GM knew of the Shift Defect; GM was under a duty to disclose the Shift Defect based upon  
27 its exclusive knowledge of it, its affirmative representations about it, and its concealment of it, and  
28 GM never disclosed the Shift Defect to Plaintiffs or the public at any time or place or in any manner.

29 219. Indeed, GM to this day continues to deny the Shift Defect exists and vigorously  
30 contests its existence in ongoing litigation, has never acknowledged to consumers the Shift Defect  
31 exists in any public announcement, and its authorized dealerships continually inform consumers the  
32 symptoms of the Shift Defect are merely normal operation of properly functioning transmission.

33 220. Plaintiffs make the following specific fraud allegations with as much specificity as  
34 possible, although they do not have access to information necessarily available only to GM:

1           221. **Who:** as noted in Part B, *supra*, GM personnel knew of but actively concealed the  
2 Shift Defect from Plaintiffs and Class members while simultaneously touting the quality, durability  
3 and performance of the Class Vehicles and their 8L90 and 8L45 transmissions. In addition to  
4 management, the GM personnel at issues include former GM Assistant Chief Engineer Bill Goodrich,  
5 and former GM Chief Engineer Kaveh Kavooos, who participated in public appearances or were  
6 quoted in press releases touting the 8L transmissions, when they were well aware they suffered from  
7 a Shift Defect. This also includes Cadillac President Johan deNyssen who had heard from dealers  
8 about the Shift Defect and did not inform customers. Similarly, Brand Quality Manager Mark Gordon  
9 who apprised dealers to tell customers the Shift Defect was normal, when it knew it was not, and a  
10 redesign for the 8L was needed but would not be ready until MY23.  
11

12           222. **What:** GM knew the Class Vehicles suffer from the Shift Defect. GM concealed the  
13 Shift Defect and made contrary representations about the quality, durability, performance, and other  
14 attributes of the Class Vehicles.  
15

16           223. **When:** GM concealed material information regarding the Shift Defect at all times and  
17 made representations about the quality, durability, and performance of the Class Vehicles, starting no  
18 later than 2014, or at the subsequent introduction of certain models of Class Vehicles to the market,  
19 continuing through the time of sale, and on an ongoing basis, and continuing to this day. GM has not  
20 disclosed the truth about the Shift Defect in the Class Vehicles to anyone outside of GM. GM has  
21 never taken any action to inform consumers about the true nature of the Shift Defect in Class Vehicles.  
22 And when consumers brought their Class Vehicles to GM complaining of the symptoms associated  
23 with the Shift Defect, GM denied any knowledge of, or responsibility for, the Shift Defect, and called  
24 it a “normal” characteristic.  
25

26           224. **Where:** GM concealed material information regarding the true nature of the Shift  
27 Defect in every communication it had with Plaintiffs and Class members and made contrary  
28 representations about the quality, durability, and performance of the Class Vehicles and their 8L90

1 and 8L45 transmissions. Such information is not adequately disclosed in any sales documents,  
2 displays, advertisements, warranties, owner's manual, or on GM's website.

3       225. **How:** GM concealed the Shift Defect from Plaintiffs and Class members and made  
4 representations about the quality and durability of the Class Vehicles. GM actively concealed the  
5 truth about the existence and nature of the Shift Defect from Plaintiffs and Class members, even  
6 though it knew about the Shift Defect and knew that information about the Shift Defect would be  
7 important to a reasonable consumer, and GM promised in its marketing materials the Class Vehicles  
8 have qualities they do not have, and moreover, made representations in its warranties it knew were  
9 false, misleading, and deceptive.

10  
11       226. **Why:** GM actively concealed material information about the Shift Defect in Class  
12 Vehicles, and simultaneously made representations about the quality, durability, and performance of  
13 the Class Vehicles and their 8L90 and 8L45 transmissions, for the purpose of inducing Plaintiffs and  
14 Class members to purchase the Class Vehicles, rather than purchasing or leasing competitors'  
15 vehicles. Had GM disclosed the truth, for example, in its advertisements or other materials or  
16 communications, Plaintiffs (and reasonable consumers) would have been aware of the Shift Defect  
17 and would not have bought the Class Vehicles or would have paid less for them.

18  
19       **E. GM Has Actively Concealed the Shift Defect**

20       227. Despite its knowledge of the Shift Defect in the Class Vehicles, Defendant actively  
21 concealed the existence and nature of the Shift Defect from Plaintiffs and Class Members.  
22 Specifically, Defendant failed to disclose to or actively concealed from Plaintiffs and Class Members,  
23 at and after the time of purchase or repair, and thereafter:

24  
25       A. any and all known material defects or material nonconformities of the Class  
26 Vehicles, including the Shift Defect;

27       B. the Class Vehicles were not in good working order, were defective, and were  
28 not fit for their intended purpose; and

1 C. the Class Vehicles were defective, even though GM learned of the Shift Defect.  
2 before it placed the Class Vehicles in the stream of commerce.

3 228. More troubling, Defendant did not issue any recall and otherwise refuses to  
4 acknowledge the Defect, despite TSBs as early as 2014 recognizing the Defect, but do not  
5 acknowledge that since 2018 a redesign was planned (“Gen 2”) specifically to address the Shift  
6 Defect.  
7

8 229. GM has also directed its authorized dealerships to inform Plaintiffs and members of  
9 the Class the jerking, hesitation, surging, and lurching are normal and no repairs are necessary. This  
10 result in customers and dealers often trying unnecessary repairs or changes, like tires, suspension,  
11 etc., which do not correct the Shift Defect.  
12

13 230. Defendant has deprived Class Members of the benefit of their bargain, exposed them  
14 all to a dangerous safety Shift Defect, and caused them to expend money at their dealerships and/or  
15 be unable to drive their vehicles for stretches of time, while they are being constantly repaired.

16 231. Moreover, when vehicles are brought to Defendant's dealers for repair, whether  
17 covered by warranty or not, Class Members are provided with ineffective repairs in which defective  
18 parts are replaced with other defective parts, as experienced by Plaintiffs.

19 232. Specifically, both Plaintiffs were told repeatedly the symptoms of the Shift Defect they  
20 experienced were normal. Further, the symptoms of the Shift Defect remained even after they were  
21 given ineffectual repairs, including an update of the transmission control module. Time and time  
22 again, Plaintiffs were told by authorized GM dealerships there is nothing wrong with their vehicles  
23 and were also told harsh shifting and other characteristics of the Shift Defect were “normal.” This  
24 evidences a continuing pattern of action to conceal the Shift Defect.  
25

26 233. Indeed, as recently as December 2025, GM denied via counsel in court the Shift Defect  
27 exists. Therefore, GM is estopped from using a statute of limitations defense against the Class  
28 because GM: 1) instructed its authorized dealerships to describe the Shift Defect as “normal”

1 operation including to Plaintiffs in 2023 and 2024; 2) instructed its authorized dealerships to perform  
2 “repairs” which it knew to be ineffective in remedying the Shift Defect; and 3) continues to deny the  
3 Shift Defect exists in publicly filed documents and in court proceedings through 2025.

4           234. As a result, Class Members continue to experience the Shift Defect despite having  
5 repairs, as shown by the experiences of Plaintiffs. Because many Class Members, like Plaintiffs, are  
6 current owners who rely on their vehicles daily, compensation for repairs, related expenses, and  
7 diminution in value is not sufficient.

8           235. Defendant has not recalled all the Class Vehicles to repair the Shift Defect, has not  
9 offered to its customers a free suitable repair or free replacement of parts related to the Shift Defect,  
10 under the recall or otherwise, and has not reimbursed all Class Vehicle owners who incurred costs for  
11 repairs related to the Shift Defect.

12           236. Class Members have not received the value for which they bargained when they  
13 purchased the Class Vehicles.

14           237. As a result of the Shift Defect, the value of the Class Vehicles has diminished,  
15 including without limitation, the resale value of the Class Vehicles.

16           238. The existence of the Shift Defect is a material fact which a reasonable consumer would  
17 consider when deciding whether to purchase a Class Vehicle. Whether a vehicle’s transmission  
18 contains a defect causing lurching forward, sudden acceleration, delayed acceleration, and sudden  
19 loss of forward propulsion is a material safety concern. Had Plaintiffs and other Class Members  
20 known of the Shift Defect, they would have paid less for the Class Vehicles or would not have  
21 purchased them.

22           239. Reasonable consumers, like Plaintiffs, expect a vehicle is safe, will function in a  
23 manner which will not pose a safety risk, is free from defects, and will not malfunction while  
24 operating the vehicle as it is intended. Plaintiffs and Class Members further expect and assume GM  
25  
26  
27  
28

1 will not sell vehicles with known safety defects, such as the Shift Defect, and will fully disclose any  
2 such defect to consumers prior to purchase or offer a suitable non-defective repair.

3 240. The Class Vehicles do not function as GM intended; no manufacturer intends for a  
4 vehicle's transmission and related components to result in lurching, jerking, sudden acceleration,  
5 delayed acceleration, and present substantial safety risks as a result.  
6

7 **CLASS ALLEGATIONS**

8 284. Plaintiffs bring this suit pursuant to *Code of Civil Procedure* section 382 and  
9 *California Rule of Court* 3.764, on behalf of themselves and the following proposed class:

10 **Class:** All consumers who purchased 2019 Sierras, Silverados,  
11 Canyons, or Colorados designed, manufactured, marketed,  
12 distributed, sold, warranted and serviced by GM, equipped with GM's  
eight-speed Hydra-Matic 8L90 transmission or Hydra-Matic 8L45  
transmission manufactured after March 1, 2019 in California.

13 285. Excluded from the Class are Defendant; its employees, officers, directors, legal  
14 representatives, heirs, successors, and wholly or partly owned subsidiaries or affiliates of  
15 Defendant; Class Counsel and their employees; the judicial officers and their immediate family  
16 members and associated court staff assigned to this case; and all persons within the third degree of  
17 relationship to any such persons.

18 286. Certification of Plaintiffs' claims for class-wide treatment is appropriate because  
19 Plaintiffs can prove the elements of their claims on a class-wide basis using the same evidence used  
20 to prove those elements in individual actions alleging the same claim.

21 287. This action is brought and may be properly maintained on behalf of the Class  
22 proposed herein under *Code of Civil Procedure* section 382 and *California Rule of Court* 3.764.

23 288. **Numerosity.** Although the exact number of Class Members is uncertain and can  
24 only be ascertained through appropriate discovery of Defendant's records, the number is great  
25 enough such that joinder is impracticable. The disposition of the claims of Class Members in a  
26 single action will provide substantial benefits to all parties and to the Court. Class Members will be  
27 readily identifiable from information and records in Defendant's possession, custody, and/or  
28 control.

1           289. **Commonality and Predominance.** This action involves common questions of law  
2 and fact, which predominate over any questions affecting individual Class Members, including, but  
3 not limited to the following:

4           (a) Whether Class Vehicles contain defects relating to the GM 8L45 or 8L90  
5 Transmission;

6           (b) Whether the defects relating to the GM 8L45 or 8L90 Transmission constitute an  
7 unreasonable safety risk;

8           (c) Whether the defective nature of the GM 8L45 or 8L90 Transmission constitutes a  
9 material fact;

10           (d) Whether Defendant has a duty to disclose the defective nature of the GM 8L45 or 8L90  
11 Transmission to Plaintiffs and Class Members;

12           (e) Whether Defendant knew or reasonably should have known of the defects relating to  
13 the GM 8L45 or 8L90 Transmission before it sold Class Vehicles to Plaintiffs and Class  
14 Members and, if so, how long Defendant has known of the defect;

15           (f) Whether and how much Defendant's misconduct and the Shift Defect have inflicted  
16 economic harm upon purchasers of the Class Vehicles;

17           (g) Whether due to Defendant's misconduct as alleged herein, Plaintiffs and Class  
18 Members are entitled to restitution, injunctive relief, and other remedies, and if so, the  
19 amount and nature of such relief; and

20           (h) Such other common factual and legal issues as are apparent from the allegations and  
21 causes of action asserted herein.

22           290. **Typicality.** Plaintiffs' claims are typical of the claims of the Class. Plaintiffs, like  
23 all Class Members, purchased a Class Vehicle designed, manufactured, and distributed by GM, and  
24 equipped with the defective GM 8L45 or 8L90 transmissions. Plaintiffs' claims are typical of the  
25 Class Members' claims because, among other things, all Class Members were comparably injured  
26  
27  
28

1 through Defendant's wrongful conduct as described above. All claims seek recovery on the same  
2 legal theories and are based on Defendant's common course of conduct.

3 291. **Adequacy.** Plaintiffs will fairly and adequately protect the interests of the Class.  
4 Plaintiffs have retained attorneys experienced in the prosecution of class actions, including  
5 consumer class actions, and Plaintiffs intend to prosecute this action vigorously. The Class's  
6 interests will be fairly and adequately protected by Plaintiffs and their counsel.

7 292. **Superiority.** A class action is superior to any other available means for the fair and  
8 efficient adjudication of this controversy, and no unusual difficulties are likely to be encountered  
9 in the management of this class action. The damages or other financial detriment suffered by  
10 Plaintiffs and Class Members are relatively small compared to the burden and expense required to  
11 individually litigate their claims against Defendant. Thus, it is impracticable for Class members to  
12 individually seek redress for Defendant's wrongful conduct. Even if Class Members could afford  
13 individual litigation, the court system could not. Individualized litigation creates a potential for  
14 inconsistent or contradictory judgments and increases the delay and expense to all parties and the  
15 court system. By contrast, the class action device presents far fewer management difficulties and  
16 provides the benefits of single adjudication, economy of scale, and comprehensive supervision by  
17 a single court.

### 18 **Tolling of the Statutes of Limitations**

19 241. Any applicable statute(s) of limitations has been tolled by 1) GM's knowing and  
20 active concealment and denial of the facts alleged herein; 2) principles of estoppel, as GM, through  
21 dealers, continued to "repair" the Class Vehicles while under warranty without disclosing the Shift  
22 Defect; and 3) operation of the discovery rule as Plaintiffs could not have learned of the Shift Defect  
23 pre-purchase, and only after press reports of the *Speerly* class certification did they learn of a potential  
24 lawsuit.  
25

#### 26 **A. Fraudulent Concealment**

27 242. As previously described, any applicable statute(s) of limitations has been tolled by  
28 GM's knowing and active concealment and denial of the facts alleged herein. Plaintiffs and

1 members of the Class could not have reasonably discovered the nature of the Shift Defect prior to  
2 this class action litigation being commenced.

3 243. GM was and remains under the continuing duty to disclose to Plaintiffs and members  
4 of the Class the true character, quality and nature of the Class Vehicles which will require costly  
5 repairs, pose a safety concern, and diminish the resale value of the Class Vehicles. As a result of the  
6 active concealment by GM, any and all applicable statutes of limitations otherwise applicable to the  
7 allegations herein have been tolled.  
8

9 244. GM has known of the Shift Defect in the Class Vehicles since at least 2014, and has  
10 concealed from, or failed to, notify Plaintiffs, Class Members, and the public of the full and  
11 complete nature of the Shift Defect, even when directly asked about it by Plaintiffs and Class  
12 Members during communications with GM, GM Customer Assistance, GM dealerships, and GM  
13 service centers. GM continues to conceal the Shift Defect to this day.  
14

15 **B. Estoppel**

16 245. GM was, and is, under a continuous duty to disclose to Plaintiffs and Class members  
17 the true character, quality, and nature of the Class Vehicles. GM actively concealed—and continues  
18 to conceal—the true character, quality, and nature of the Class Vehicles and knowingly made  
19 representations about the quality and durability of the Vehicles. Plaintiffs and Class Members  
20 reasonably relied upon GM's knowing and affirmative representations and/or active concealment of  
21 these facts. Based on the foregoing, GM is estopped from relying on any statutes of limitation in  
22 defense of this action.  
23

24 ***Discovery Rule***

25 246. The causes of action alleged herein did not accrue until Plaintiffs and Class Members  
26 discovered their Class Vehicles suffered from the Shift Defect. Plaintiffs and the Class Members had  
27 no realistic ability to discern the GM 8L45 and 8L90 Transmissions in Class Vehicles were defective  
28

1 until (at the earliest) after the Shift Defect manifested in their 8L90 and 8L45 transmissions and/or  
2 component parts failed.

3 247. Even then, Plaintiffs and Class Members had no reason to know such manifestations  
4 were caused by a defect in the Class Vehicles because of GM's active concealment of the Shift Defect.  
5 Not only did GM fail to notify Plaintiffs or Class members about the Shift Defect, GM, in fact, denied  
6 any knowledge of, or responsibility for, the Shift Defect when directly asked about it.  
7

8 248. Thus, Plaintiffs and Class Members were not reasonably able to discover the Shift  
9 Defect until after they had purchased the Class Vehicles, despite their exercise of due diligence, and  
10 their causes of action did not accrue until, at earliest, they discovered the Shift Defect was causing  
11 failure in the 8L90 and 8L45 transmissions of their Vehicles.  
12

13 **FIRST CAUSE OF ACTION**  
**Violation of *California Civil Code* §§ 1750, *et seq.***  
**(on Behalf of Plaintiffs and the Class)**

14 249. Plaintiffs incorporate by reference each of the allegations contained in the preceding  
15 paragraphs of this Complaint.

16 249. Plaintiffs bring this cause of action on behalf of themselves and the Class.

17 249. This cause of action is brought pursuant to the Consumers Legal Remedies Act,  
18 *California Civil Code* sections 1750, *et seq.* ("CLRA").

19 249. The CLRA has adopted a comprehensive statutory scheme prohibiting various  
20 deceptive practices in connection with the conduct of a business providing goods, property, or  
21 services to consumers primarily for personal, family, or household purposes.

22 249. Defendant is a "person" as defined by *Civil Code* section 1761(c) because it is a limited  
23 liability company.

24 249. Plaintiffs and Class Members are "consumers" within the meaning of *Civil Code*  
25 section 1761(d) because they are individuals who purchased their Class Vehicles for personal, family,  
26 and/or household use.  
27  
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1           299. Defendant's Class Vehicles are "products" within the meaning of *California Civil*  
2 *Code* section 1761(a) because they are tangible chattels bought for personal, family, and/or household  
3 purposes.

4           300. Defendant's representations involving its Class Vehicles constitute "transaction[s]" as  
5 defined by *Civil Code* section 1761(e), because they involve the sale and ownership of its Class  
6 Vehicles.

7           301. By failing to disclose and concealing the defective nature of the transmissions from  
8 Plaintiffs and Class Members, Defendant violated *California Civil Code* section 1770(a), as it  
9 represented the Class Vehicles and their transmissions had characteristics and benefits they do not  
10 have and represented the Class Vehicles and their transmissions were of a particular standard, quality,  
11 or grade when they were of another. *See Cal. Civ. Code* §§ 1770(a)(5) & (7).

12           302. Defendant's unfair and deceptive acts or practices occurred repeatedly in Defendant's  
13 trade or business, were capable of deceiving a substantial portion of the purchasing public and  
14 imposed a serious safety risk on the public.

15           303. Defendant knew the Class Vehicles and their transmissions suffered from an inherent  
16 defect, were defectively designed or manufactured, and were not suitable for their intended use.

17           304. Because of their reliance on Defendant's omissions, owners of the Class Vehicles,  
18 including Plaintiffs and Class Members, suffered an ascertainable loss of money, property, and/or  
19 value of their Class Vehicles. Additionally, because of the Shift Defect, Plaintiffs and Class Members  
20 were harmed and suffered actual damages including economic damages at the point of sale and  
21 diminution of value of their Class Vehicles, and costs for repair.

22           305. Defendant was under a duty to Plaintiffs and Class Members to disclose the defective  
23 nature of the transmissions and/or the associated repair costs because:

24           (a) Defendant was in a superior position to know the true state of facts about the safety  
25 defect in the Class Vehicles' transmissions;  
26  
27  
28

1 (b) Plaintiffs and Class Members could not reasonably have been expected to learn or  
2 discover their transmissions had a dangerous safety defect until it manifested; and

3 (c) Defendant knew Plaintiffs and Class Members could not reasonably have been  
4 expected to learn of or discover the Shift Defect.

5 306. In failing to disclose the defective nature of transmissions, Defendant knowingly and  
6 intentionally concealed material facts and breached its duty not to do so.

7  
8 307. The facts Defendant concealed from or failed to disclose to Plaintiffs and Class  
9 Members are material because a reasonable consumer would have considered them to be important  
10 in deciding whether to purchase the Class Vehicles or pay less. Had Plaintiffs and Class Members  
11 known the Class Vehicles' transmissions were defective, they would not have purchased the Class  
12 Vehicles or would have paid less for them.

13  
14 308. Plaintiffs and Class Members are reasonable consumers who do not expect the  
15 transmissions installed in their vehicles to exhibit problems such as the Shift Defect. This is the  
16 reasonable and objective consumer expectation relating to a vehicle's transmissions.

17 309. Because of Defendant's conduct, Plaintiffs and Class Members were harmed and  
18 suffered actual damages in that, on information and belief, the Class Vehicles experienced and will  
19 continue to experience problems such as the Shift Defect.

20 310. As a direct and proximate result of Defendant's unfair or deceptive acts or practices,  
21 Plaintiffs and Class Members suffered and will continue to suffer actual damages.

22  
23 311. Plaintiffs and Class Members provided Defendant with notice of its violations of the  
24 CLRA pursuant to *California Civil Code* section 1782(a). Defendant has failed to provide appropriate  
25 relief for its violations of the CLRA within 30 days, California Plaintiffs now seek monetary,  
26 compensatory, and punitive damages.

27  
28 **SECOND CAUSE OF ACTION**  
**VIOLATION OF CALIFORNIA BUS. & PROF. CODE, §17200, ET SEQ.**  
**(on Behalf of Plaintiffs and the Class)**

1  
2 312. Plaintiffs incorporate by reference each of the allegations contained in the preceding  
3 paragraphs of this Complaint.

4 313. Plaintiffs bring this cause of action on behalf of themselves and the Class.

5 314. Because of their reliance on Defendant's omissions, owners of the Class Vehicles,  
6 including Plaintiffs and Class Members, suffered an ascertainable loss of money, property, and/or  
7 value of their Class Vehicles. Additionally, because of the Shift Defect, Plaintiffs and Class Members  
8 were harmed and suffered actual damages including economic damages at the point of sale and  
9 diminution of value of their Class Vehicles, and costs of repair.

10 315. *California Business & Professions Code* section 17200 prohibits acts of "unfair  
11 competition," including any "unlawful, unfair or fraudulent business act or practice" and "unfair,  
12 deceptive, untrue or misleading advertising."

13 316. Plaintiffs and Class Members are reasonable consumers who do not expect their  
14 transmissions to be defective.

15 317. Defendant knew the Class Vehicles and their transmissions were defectively designed  
16 or manufactured, would fail prematurely, and were not suitable for their intended use.

17 318. In failing to disclose the Shift Defect, Defendant has knowingly and intentionally  
18 concealed material facts and breached its duty not to do so.

19 319. Defendant was under a duty to Plaintiffs and Class Members to disclose the defective  
20 nature of the Class Vehicles and their transmissions because:

21 (a) Defendant was in a superior position to know the true state of facts about the safety  
22 defect in the Class Vehicles' transmissions; and

23 (b) Defendant actively concealed and continues to actively conceal the defective nature of  
24 the Class Vehicles and their transmissions from Plaintiffs and Class Members.

25 320. The facts Defendant concealed from or failed to disclose to Plaintiffs and Class  
26 Members are material because a reasonable person would have considered them to be important in  
27  
28

1 deciding whether to purchase Class Vehicles. Had they known of the Shift Defect, Plaintiffs and Class  
2 Members would have paid less for Class Vehicles equipped with the subject transmissions or would  
3 not have purchased them at all.

4 321. Defendant continued to conceal the defective nature of the Class Vehicles and their  
5 transmissions even after Class Members began to report problems.

6 322. Defendant's conduct was and is likely to deceive consumers.

7 323. Defendant's acts, conduct, and practices were unlawful, because they constituted  
8 violations of California's Consumers Legal Remedies Act.

9 324. By its conduct, Defendant has engaged in unfair competition and unlawful, unfair, and  
10 fraudulent business practices.

11 325. Defendant's unfair or deceptive acts or practices occurred repeatedly in Defendant's  
12 trade or business and were capable of deceiving a substantial portion of the purchasing public.

13 326. As a direct and proximate result of Defendant's unfair and deceptive practices,  
14 Plaintiffs and Class Members have suffered and will continue to suffer actual damages.

15 327. Defendant has been unjustly enriched and should be required to make restitution to  
16 Plaintiffs and Class Members to sections 17203 and 17204 of the *Business & Professions Code*.

17 **PRAYER FOR RELIEF**

18 328. Plaintiffs, on their behalf and on behalf of the members of the Class, respectfully  
19 requests the following relief:

20 a. An order certifying the proposed Class, appointing Plaintiffs as  
21 Representatives of the Class, and designating the undersigned counsel as  
22 Class Counsel;

23 b. For a public-wide injunction permanently enjoining Defendant from  
24 engaging in the violations of *Civil Code* section 1770, including but not  
25 limited to subsection (a)(14);  
26  
27  
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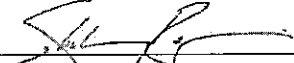
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- c. For attorney’s fees and costs of suit as authorized by statute including, but not limited to the provisions of *Civil Code* section 1780 and *Code of Civil Procedure* section 1021.5 and as authorized under the common fund doctrine and or as authorized by the substantial benefit doctrine;
- d. Leave to amend the Complaint to conform to the evidence produced in discovery and at trial; and
- e. Any such other and further relief the Court deems just and equitable.

Dated: January 12, 2026

Respectfully submitted,

Capstone Law APC

By: 

Cody R. Padgett  
Shahin Rezvani  
Kathy Pham  
Attorneys for Plaintiffs and the proposed  
Class

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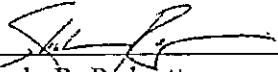
**DEMAND FOR JURY TRIAL**

Pursuant to *Code of Civil Procedure* section 631, Plaintiffs hereby demand a jury trial on all issues so triable.

Dated: January 12, 2026

Respectfully submitted,

Capstone Law APC

By: 

Cody R. Padgett  
Shahin Rezvani  
Kathy Pham  
Attorneys for Plaintiffs and the proposed  
Class